9700 - REFERENCE PLANS

WILDLIFE RESPONSE PLAN
for California

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(Special Note. The following Appendices are not included in the hardcopy version of the Area Contingency Plan. However, they all can be found in their entirety on the CDFG-OSPR web site at **www.dfg.ca.gov/ospr/index.html)**

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9710 - WILDLIFE RESPONSE PLAN FOR CALIFORNIA

When oil spills occur in California, response actions concerning the identification, protection, rescue, processing and rehabilitation of oiled or threatened wildlife are performed by the Wildlife Branch, a subsection of the Operations Section within the Unified Command/Incident Command System (UC/ICS, sections 2100-2210) and commonly referred to as Wildlife Operations (WO) (Figure 1). Under the direction of the Wildlife Branch Director (WBD), WO are dedicated to prevent, reduce, document and mitigate spill impacts on wildlife.

This Area Contingency Plan's (ACP's) Wildlife Response Plan describes the responsibilities and capabilities of WO, including the procedures to be used and the personnel and equipment resources necessary to meet the wildlife protection responsibilities of the Federal and State governments in California oil spills. Section 9710.1, below, describes the statutory, policy and procedural bases for WO. Section 9710.2 describes the organizational infrastructure for wildlife response operations. Sections 9710.3 discusses initial WO activation and the factors to consider when developing a response. Section 9710.4 describes the various WO Group and Unit functions and procedures, including wildlife reconnaissance, protection, capture, transportation, veterinary treatment and rehabilitation activities in a spill. Section 9710.5 briefly addresses demobilization of WO. The Appendices include: a complete list bibliographic information on the documents cited in the text; detailed protocols for the processing and hazing groups; the Sea Otter Oil Spill Contingency Plan; Oiled Wildlife Care Network and volunteer information; and various forms to be used in WO. **Special Note.** The Appendices are not included in the hardcopy version of the Area Contingency Plan. However, they all can be found in their entirety on the USCG and CDFG-OSPR web sites at www.uscg.mil/pacarea/pm/Graphic/Response.htm and www.dfg.ca.gov/ospr/index.html, respectively.

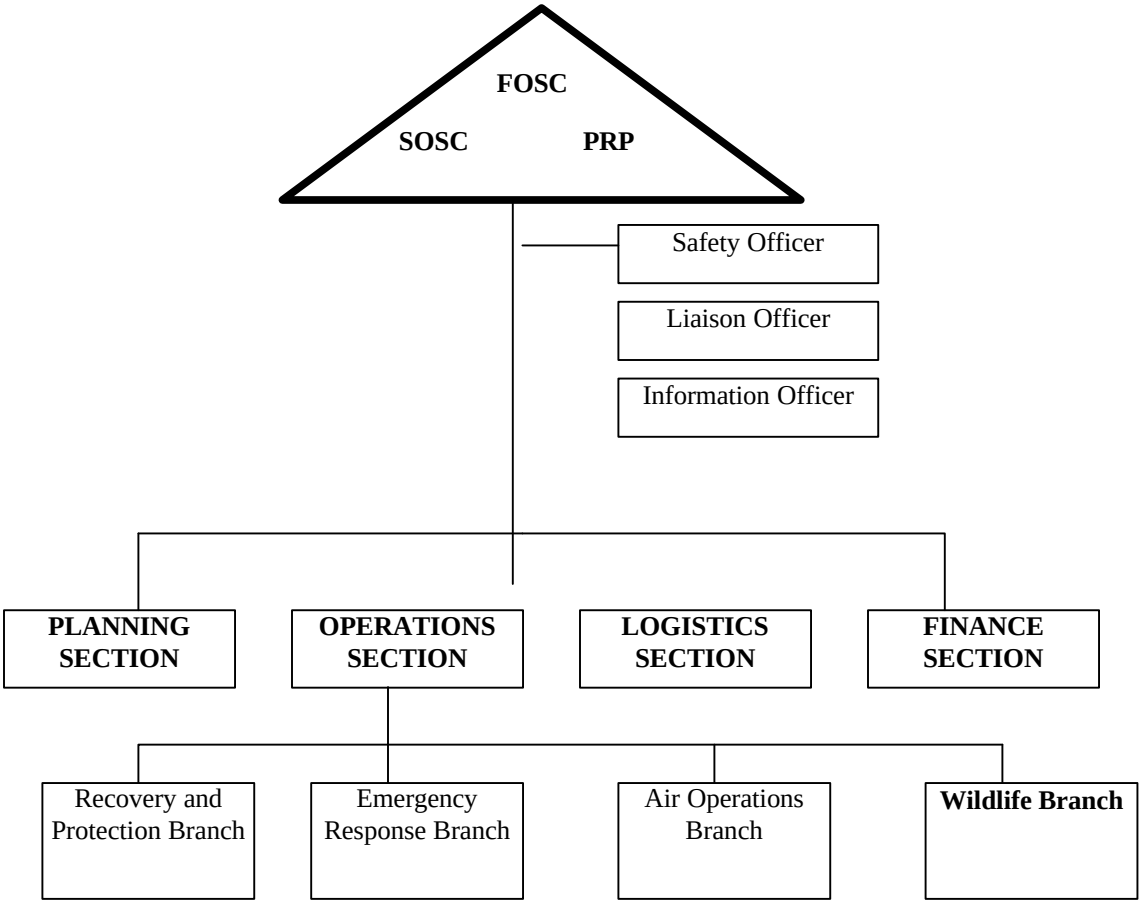
The Wildlife Response Plan for California has been developed jointly by the members of the wildlife operations subcommittee of the San Francisco Bay/Delta Area Committee. The Committee included personnel from the: California Department of Fish and Game - Office of Spill Prevention and Response, U. S. Coast Guard, U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, National Park Service, San Francisco Bay Conservation and Development Commission, the California Coastal Commission, Oiled Wildlife Care Network, and the Exxon Corporation. The Plan has been developed to meet the National Area Contingency Plan's Fish and Wildlife and Sensitive Environments Plan requirements set forth in 40 CFR Part 300, Section 300.210(c)(4), and to be usable throughout California.

While the Wildlife Response Plan has been designed principally to cover oil spills into marine waters as required by Federal and State law, it is applicable to inland oil and non-oil spills as well. The organizational structure, roles and responsibilities remain the same, although some functions may be altered as appropriate.

9710.1 INTRODUCTION & BACKGROUND

Marine wildlife in California is abundant and diverse; occurring in habitats that range from deep offshore waters to shallow tidelands, from steep rocky shores to sandy beaches and wetlands. About 200 species of coastal and marine birds, 33 species of cetaceans (whales and dolphins), six species of pinnipeds (seals and sea lions), and aquatic mammals including the California sea otter, river otters, and beavers are residents or migrants in the offshore, coastal,

Figure 1. Wildlife Branch position in the UC/ICS Organization



bay and estuary waters of California. Also, intertidal and subtidal habitats contain thousands of other species of fish, invertebrates and seaweeds (Leet et al., 1992). All marine wildlife species and their habitats are vulnerable to an oil spill (Bonnell, Ford and Casey, 1993).

The principle objectives of WO during spill response and cleanup are to: (1) protect wildlife and habitats from oiling; (2) protect wildlife and habitats from adverse effects of response measures; (3) minimize unavoidable injuries to wildlife and habitats; (4) rescue and rehabilitate the maximum number of impacted wildlife possible; and (5) document for the Unified Command (UC) the resources at risk and the impacts to marine wildlife. To ensure that these objectives are achieved with maximum efficiency, WO coordinates and manages the activities of the federal, state, local agencies; along with commercial and non-profit organizations responsible for marine wildlife protection and management who fall under the authority of the UC during spill response. Successful WO are accomplished within the UC by the timely and effective deployment and coordination of equipment and trained personnel who carry out established protocols to avoid and minimize wildlife casualties, document impacts, and treat affected wildlife.

Federal and State Law Mandates. The Federal Oil Spill Pollution Act of 1990 (OPA-90) requires, as part of the National Contingency Plan for oil spills, that a Fish and Wildlife and Sensitive Environment Plan be developed in consultation with the U.S. Fish and Wildlife Service (USFWS), the National Oceanic and Atmospheric Administration (NOAA), and other interested parties, including state fish and wildlife agencies (33 U.S.C. § 1321(d)(2)(M)). The plan must include "immediate and effective

protection, rescue, rehabilitation of, and the minimization of risk of damage to fish and wildlife resources and habitat that are harmed or that may be jeopardized by a discharge." The requirements for this plan as an annex to Area Contingency Plans are set forth in 40 CFR Part 300, Section 300.210(c)(4). The "Wildlife Response Plan" has been written in conjunction with other sections of the Area Contingency Plan, to address the Federal requirements.

The fish and wildlife provisions of California's Lempert-Keene-Seastrand Oil Spill Prevention and Response Act (OSPRA) (Government Code §§ 8574.7, 8670.37.5) parallel or exceed the OPA-90 fish and wildlife response protection provisions in most respects. Under OSPRA, the Administrator of the California Department of Fish and Game-Office of Spill Prevention and Response (DFG-OSPR or OSPR) must develop contingency plans for the protection of fish and wildlife, assess injuries to natural resources, establish rescue and rehabilitation stations for marine wildlife, and require restoration plans for wildlife resources including habitat following spills. OSPRA also provides for the establishment and funding of the Oiled Wildlife Care Network (OWCN) (Government Code § 8670.37.5) as an essential component of California's wildlife response capability (Mazet et al., 1999).

Natural Resource Trustees. In any spill, the potential responsible party or discharger (PRP) is responsible to federal and state resource trustees, to federally-recognized Indian tribes, and to foreign trustees, all of whom are empowered to enforce remediation and seek compensation for injuries to natural resources caused by a discharge of oil (40 CFR Part 300, Subpart G). These trustee agencies also have a voice in determining the methods used so that wildlife operations comply with each trustee's governing laws and their obligations to preserve and protect wildlife and habitat. During a spill response, the wildlife trustee agencies will advise the Wildlife Branch Director (WBD) on local wildlife resources, especially sensitive species or habitats, logistical consideration, and other issues that arise.

The state and federal trustee agencies that are most likely to participate in WO decisions and response activities are as follows:

Federal:

Department of the Interior
National Park Service (NPS)
U.S. Fish and Wildlife Service (USFWS)
Department of Commerce
National Oceanic and Atmospheric Administration (NOAA)
National Marine Sanctuaries (NMS)
National Marine Fisheries Service (NMFS)
Department of Defense (DOD)

Although they are not natural resource trustee agencies, the U.S. Coast Guard (USCG) and/or the U.S. Environmental Protection Agency (EPA) are the lead federal agencies in a spill and also participate fully in WO decisions.

The California Department of Fish and Game-Office of Spill Prevention and Response is the lead state trustee agency for wildlife and habitat during oil spills. Other California trustee agencies, or agencies that may otherwise participate in WO decisions, include:

California Department of Fish and Game (CDFG)
California Department of Parks and Recreation (CDPR)
State Lands Commission (SLC)
California Department of Water Resources (CDWR)
California State Water Resources Control Board (SWRCB)
Regents of the University of California

Interagency Agreements Regarding Wildlife Response Activities. In an effort to provide a more efficient and coordinated response to the UC and natural resources, principal federal and State fish and wildlife trustees have signed cooperative agreements regarding a variety of issues during oil and toxic substance spills. These issues include agency response roles, capture, treatment, rehabilitation, and

release of impacted wildlife. The agencies involved include the CDFG, the USFWS, and the NMFS. All of the documents can be found in Appendix Ib.

The first document, "Memorandum of Understanding Designating California Department of Fish and Game as Primary Contact for Fish and Wildlife Issues in the Event of Oil or Toxic Substances Spill within the State of California," acknowledges the fact that the USFWS and the CDFG share trustee responsibilities for endangered species, migratory birds and migratory fishes. This document identifies the CDFG to designate a primary contact person for support of the UC regarding fish and wildlife issues in the State of California during oil spill response. The stated duties of this person are to: advise on and coordinate activities related to fish and wildlife problems and issues related to the spill; advise and direct efforts to minimize injury to wildlife; coordinate efforts to recover and care for oiled wildlife; maintain communication with the USFWS; and adhere to permit conditions for both the federal and State wildlife permits. These duties correlate directly with the responsibilities of the WBD.

In a second agreement between the USFWS and the CDFG, authorization is given to the CDFG to "take" federally endangered and threatened species during emergencies. The document entitled "Cooperative Agreement Between the California Department of Fish and Game and the U.S. Fish and Wildlife Service Endangered and Threatened Fish, Wildlife and Plants," establishes a cooperative agreement between agencies regarding the conservation and recovery of endangered, threatened and rare fish, wildlife and plants, pursuant to Section 6© of the Endangered Species Act of 1973 and the California Endangered Species Act of 1984. The agreement contains provisions for any employee or agent of the CDFG who is designated by that agency for such purposes may, when acting in the course of his official duties, take federally listed endangered and threatened fish, wildlife or plant species without a permit if such action is necessary. Those necessary actions are further defined in the Agreement in Appendix Ib. This gives the CDFG and its agents, such as the OWCN, permission to handle protected species during emergency spill response.

In a similar agreement to that with the USFWS, the CDFG has entered into an agreement with the NMFS to govern the rescue and rehabilitation of pinnipeds (seals and sea lions), cetaceans (dolphins and whales), and sea turtles. The document is entitled "Memorandum of Agreement Between the California Department of Fish and Game Office of Oil Spill Prevention and Response and the National Marine Fisheries Service Southwest Region Regarding the California Marine Mammal Stranding Network and the Oiled Wildlife Care Network" (Appendix Ib). The primary purposes of this agreement are (a) to ensure that pinnipeds, cetaceans, and sea turtles affected by oil spills in marine waters of the State receive the best achievable treatment and (b) to ensure the collection of sound biological and chemical data on such affected resources. The Agreement ensures consistency with and incorporates the NMFS guidelines and protocols on the rescue and release of live-stranded pinnipeds, cetaceans, and sea turtles into the OWCN protocols for response, rescue, rehabilitation and medical treatment of these animals, as outlined in the NMFS/OSPR Contingency Plan (Attachment A of this Memorandum). Other conditions include the required use of the California Marine Mammal Stranding Network (CMMSN) and OWCN personnel and facilities in the rescue and rehabilitation of pinnipeds, cetaceans, and sea turtles; cooperative information and data exchange programs, and the development of training materials.

9710.2 CALIFORNIA WILDLIFE OPERATIONS: PERSONNEL, EQUIPMENT AND OTHER RESOURCES

Wildlife Branch Director. All California WO during spill response are directed by the Wildlife Branch Director (WBD), who should be a representative of one of the natural resource trustee agencies (see Section 9710.1, above). The WBD is responsible for minimizing wildlife losses during spill response. The WBD coordinates early aerial, ground, and on-water reconnaissance of the wildlife in the spill area; employs wildlife hazing measures when required; ensures that a wildlife processing center is established and maintained; and recovers and rehabilitates impacted wildlife, and coordinates operations among the Federal and State trustee agencies (see Section 9710.1) and the OWCN (see below). The WBD also oversees activities of any other private wildlife care groups in addition to the OWCN,

including those employed by the PRP. A full description of the WBD's duties and responsibilities is in Section 3250.

The five groups of the WO Branch -- Wildlife Reconnaissance Group, Hazing Group, Recovery and Transportation Group, Processing Group, and Veterinary Services Group -- serve under the direction of the WBD. The activities of these groups are described in Section 9710.4 below. The OWCN Supervisor and the OWCN Volunteer Coordinator also work under the direction of the WBD. Figure 2 shows the relationship of these groups within WO, and the units and teams that operate under each group. See Sections 3250 to 3255 of duty statements each position.

Because of the great sensitivity of wildlife and habitat resources and the potential dangers of working with wild animals, all WO personnel must have received any specialized training, such as animal handling training, that is necessary for safe, competent completion of their assignments. Most WO activities require the involvement of at least one professional wildlife biologist with knowledge of coastal resources and, preferably, previous oil spill response experience. Staff and volunteers trained by OWCN possess the skills and expertise to participate in many units within WO. The WBD is ultimately responsible for ensuring that qualified personnel perform each WO task safely and properly.

Office of Spill Prevention and Response (OSPR). Because the Department of Fish and Game is the lead state trustee agency for wildlife resources in California, it often takes the lead in the implementation of California WO. Further, as discussed previously, OSPR is subject to state statutory requirements to protect California wildlife in a spill. As principal developers and custodians of the environmentally sensitive sites listed in the ACP, OSPR biologists are uniquely knowledgeable about marine and coastal wildlife and experienced in issues during wildlife response operations. Thus, in a spill OSPR will bear significant responsibility for informed and timely decisions about the allocation and deployment of specialized wildlife protection, rescue, and rehabilitation resources. This includes decisions regarding staff, equipment, and contractors, in coordination with the trustees. In all larger California spills to date the WBD has been an OSPR employee.

Oiled Wildlife Care Network. In addition to the OSPR, the OWCN, a statewide cooperative system of specialized wildlife health centers set up by legislative mandate (see Government Code § 8670.37.5), is integral to WO. The OWCN maintains a corps of professionally trained volunteers, paid staff and veterinarians. When California wildlife are affected by an oil spill, these personnel retrieve the oiled animals, evaluate the animals' need for treatment, and remove the toxic products from the animals. OCWN personnel then rehabilitate impacted animals, locate suitable release sites, release animals, and monitor post-release survival. The OWCN has instituted 24 permanent wildlife care participant facilities along the California coast (see Figure 3 and Table 1) for use during a spill (Mazet et al., 1999). For more information on the OCWN, see Appendix IIa and the OCWN web page at www.vetmed.ucdavis.edu/OCWN.

Potential Responsible Party. The potential responsible party (PRP) or discharger may have existing agreements with the OWCN or individual wildlife rehabilitation and care organizations. The PRP may activate their own wildlife care contractors and/or designate staff to WO Branch positions. In either case, all personnel and equipment supplied by the PRP to WO will be managed by the WBD under the UC/ICS.

Volunteers. As noted above, WO personnel may include pre-identified, trained volunteers and/or "convergent" volunteers, who are not pre-identified and whose training may range from highly skilled to completely untrained. Most volunteers are provided by and/or coordinated through the OWCN. Volunteer management efforts for tasks unrelated to the OWCN volunteers (*e.g.* pre-impact beach assessments, post-spill economic impact surveys) are coordinated instead by the OSPR Statewide Volunteer Coordinator. During a spill, the WBD, in coordination with the OWCN Response Director and the Veterinary Services Group Supervisor, will appoint a Volunteer Coordinator to manage the influx of convergent and pre-identified volunteers. The OWCN or the Volunteer Coordinator will screen convergent volunteers who wish to assist with oiled wildlife. Table 1 lists volunteer organizations that participate in the Oiled Wildlife Care Network, which can be activated by the OWCN as needed through

the Wildlife Operations Branch. WLP Appendix II contains a full discussion of the complexities of volunteer management specific to oiled wildlife care.

Figure 2: **Wildlife Branch Organization**

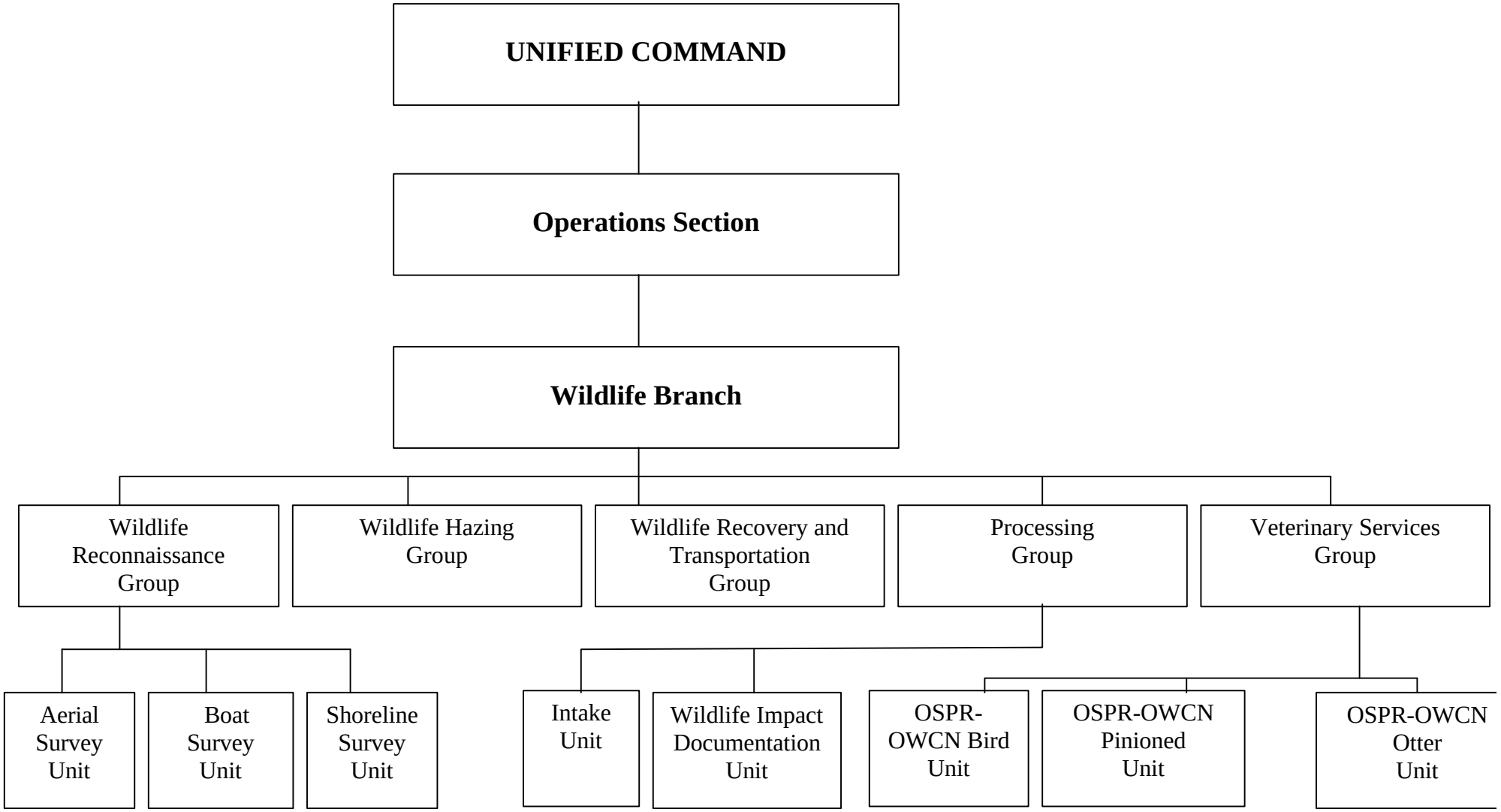


Figure 3.

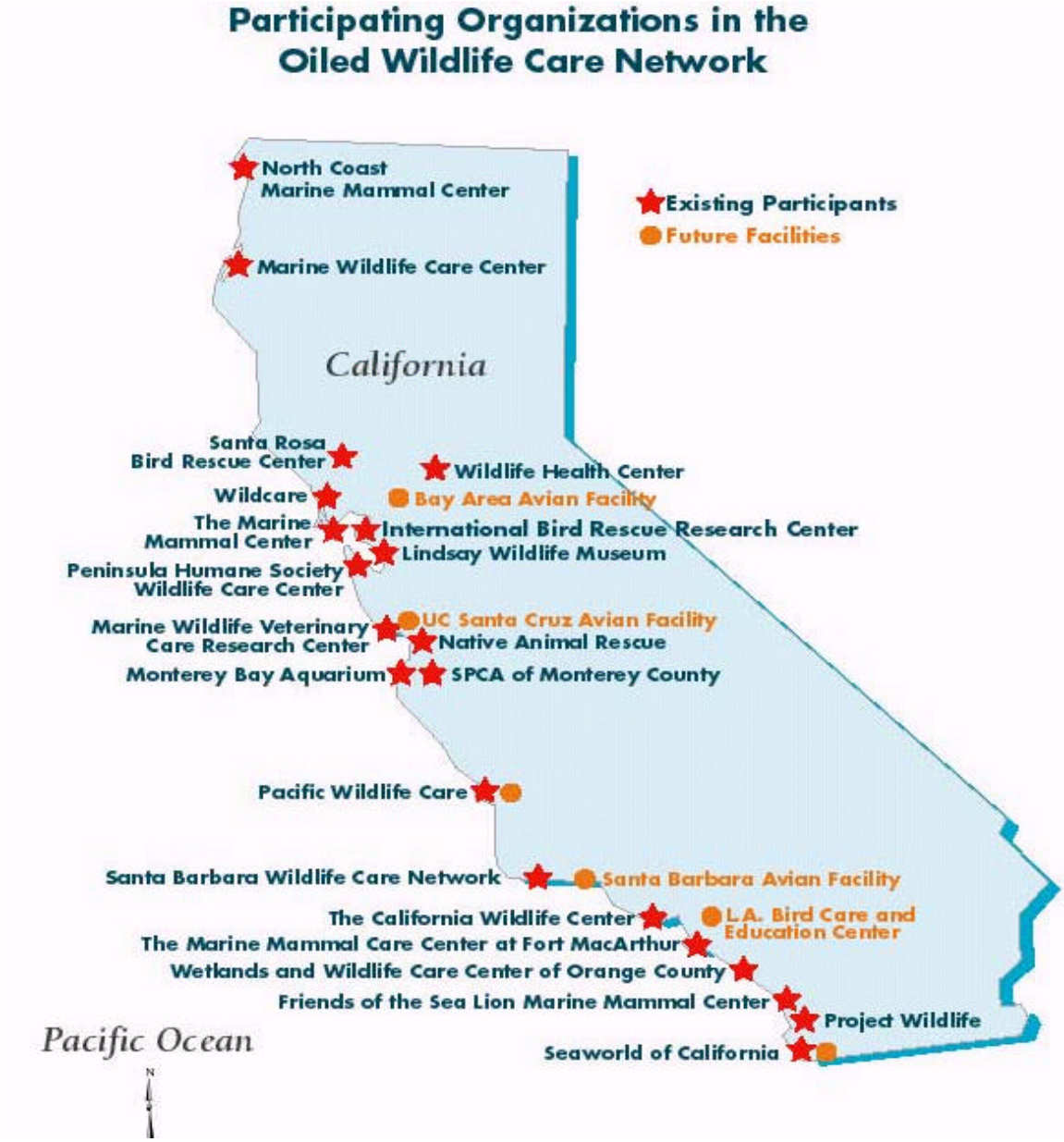

Participating Organizations in the Oiled Wildlife Care Network
North Coast Marine Mammal Center
Marine Wildlife Care Center
California
Existing Participants
Future Facilities
Santa Rosa Bird Rescue Center
Wildlife Health Center
Wildcare
Bay Area Avian Facility
The Marine Mammal Center
International Bird Rescue Research Center
Lindsay Wildlife Museum
Peninsula Humane Society Wildlife Care Center
UC Santa Cruz Avian Facility
Marine Wildlife Veterinary Care Research Center
Native Animal Rescue
Monterey Bay Aquarium
SPCA of Monterey County
Pacific Wildlife Care
Santa Barbara Wildlife Care Network
Santa Barbara Avian Facility
The California Wildlife Center
L.A. Bird Care and Education Center
The Marine Mammal Care Center at Fort MacArthur
Wetlands and Wildlife Care Center of Orange County
Friends of the Sea Lion Marine Mammal Center
Project Wildlife
Seaworld of California
Pacific Ocean
N

Table 1: Participating Centers of the Oiled Wildlife Care Network

	Organization	Primary Response Facility	Activation	Maximum Caseload
1.	North Coast Marine Mammal Center, Crescent City	*	Nov. 1995	15 marine mammals
2.	Marine Wildlife Care Center, Arcata	*	Jan. 1997	400 birds
3.	Santa Rosa Bird Rescue Center, Santa Rosa		Aug. 1995	25 birds
4.	Wildcare, San Rafael		Aug. 1995	25 birds
5.	The Marine Mammal Center, Sausalito	*	Dec. 1995	40 marine mammals 10 sea otters
6.	International Bird Rescue Research Center (existing), Berkeley		Mar. 1996	100 birds
	International Bird Rescue Research Center, Cordelia (construction of new facility)	*	May 2000	1000 - 4000 birds
7.	Lindsay Wildlife Museum, Walnut Creek		Aug. 1995	50 birds
8.	Peninsula Humane Society Wildlife Care Center, San Mateo		Aug. 1995	50 birds
9.	UC Santa Cruz Avian Facility, Santa Cruz (construction of new facility)	*	Aug. 2000	400 birds
10.	Marine Wildlife Veterinary Care Research Center, Santa Cruz	*	July 1997	125 sea otters, 50 birds, 10 other marine mammals
11.	Native Animal Rescue, Santa Cruz		Aug. 1995	25 birds
12.	Monterey Bay Aquarium, Monterey	*	Apr. 1997	10 sea otters
13.	Monterey SPCA, Monterey		Mar. 1996	25 birds
14.	Pacific Wildlife Care, San Luis Obispo (construction of new facility)	*	Apr. 2000	200 birds
15.	The California Wildlife Center		Pending	200 birds
16.	Institute of Marine Science, UC Santa Barbara, Santa Barbara		Pending	100 birds
17.	Santa Barbara Wildlife Care Network, Santa Barbara		Aug. 1995	50 birds
18.	L.A. Bird Care and Education Center, San Pedro	*	Sept. 1999	1000 birds
19.	The Marine Mammal Center at Fort MacArthur, San Pedro	*	Nov. 1995	20 marine mammals
20.	Wetlands and Wildlife Care Center of Orange Co., Huntington Beach Wetlands Conservancy, Huntington Beach	*	Mar. 1997	400 birds
21.	Friends of the Sea Lion Marine Mammal Center, Laguna Beach		Aug. 1995	5 marine mammals
22.	Sea World of California, San Diego	*	Dec. 1996	20 marine mammals including sea otters; 400 birds; sea turtles as needed
23.	Project Wildlife, San Diego		Aug. 1995	25 birds
24.	Wildlife Health Center UC Davis, School of Veterinary Medicine, Davis		June 1995	Intensive care unit: birds and endangered species as needed

Specialized WO Equipment. Some of the equipment used within the Operations Section (*e.g.,* booms, skimmers, and shallow water vessels) will serve the mission of WO and can be drawn from industry and oil spill response organization inventories. Some equipment, however, is specialized for WO and dedicated to that purpose. As with personnel, the amount of specialized equipment deployed for WO can vary from a relatively small core of items to a full-scale deployment (see Table 2 delineating three basic levels at which equipment and personnel may be deployed). Among the equipment the OSPR has dedicated for immediate deployment are:

- Air boats (1);
- All-terrain vehicles (ATVs) (3);
- Capture boats (4);
- DFG fixed wing airplane (1);
- Hazing equipment and capture equipment (various);
- Mobile vet lab (2);
- One-ton wildlife truck (1);
- Vet truck (1);
- Wildlife care trailer (2);
- Wildlife supplies trailers (4) (contain hazing, capture, and transportation equipment);
- Wildlife transport trailer (1).

Additional equipment can be obtained from the CDFG and from other government agencies, the OWCN, and response contractors. For example, the equipment that OWCN can provide includes four-wheel drive vehicles, ATVs, a rigid-hull inflatable boat, hand-held dip nets, herding boards, spotlights, animal carriers, cages, crates, protective clothing, and all-weather gear.

Wildlife databases. Throughout California, wildlife resources and critical habitats that are sensitive and vulnerable to oil have been identified through the ongoing, systematic collection of baseline data by OSPR, the Area Committee's Sensitive Site/Geographic Response Subcommittee, and other agencies. These baseline data are used to project the level of risk to sensitive wildlife resources under different spill scenarios (Bonnell et al, 1993, Ford and Bonnell, 1995; and Section 9973 and the Geographic Response Plan Maps in that section). The data collected include annual aerial censuses of major marine bird colonies (*e.g.*, Carter et al., 1996, etc.), intermittent comprehensive breeding marine bird surveys (Carter et al., 1992), at-sea surveys of resident and migratory marine birds and mammals, semi-annual sea otter surveys, annual pinniped rookery censuses, weekly shoreline surveys (Roletto et al., 1998), and sensitive habitat and wetlands identification (RPI, 1994, 1996, 1998).

Relevant baseline data are compiled by OSPR in computerized Geographic Information Systems (GIS). Critical wildlife habitats in the GIS and the associated protection strategies in the ACP can be quickly identified and plotted. For example, salt marshes are delineated, along with recommended booming configurations to protect them. The GIS coverage's as well as the NOAA Environmental Sensitivity Index (ESI) resource information can be produced on maps. In advance of a spill, these maps can be a planning tool to determine the relative sensitivity of each coastal region of California at risk from the spill. The data and maps also can be used in conjunction with those developed from real-time data during on-scene reconnaissance to evaluate the likely wildlife impacts and to guide the response decisions of the WBD, Planning Branch, and UC in the early stages of a spill. Additionally, information from these databases has been used to plan and locate wildlife care facilities and spill response equipment.

9710.3 ACTIVATION OF WILDLIFE OPERATIONS

Activation of the OSPR WO Resources. The best time to prevent wildlife impacts after a spill has occurred is during the earliest stages of the spill response. Therefore, it is imperative that OSPR be notified in a timely manner. Under California's OSPRA, the OSPR has the mandate and the capacity to mobilize its wildlife protection resources immediately, if necessary, to provide the best achievable protection for the state's wildlife, in accordance with the state contingency plan and the ACP

(Government Code §§ 8574.7, 8670.3(c)(1), 8670.5, and 8670.7(b)). Therefore, the ACP and the UC may anticipate that WO will be initiated by OSPR immediately upon first notification of a spill. When taking early actions, OSPR will maintain close coordination with the evolving UC. Such early, but prudent, initiation of a wildlife response will ensure timely mobilization of dedicated resources will minimize resource impacts, and will contribute to effective cost containment. In these instances, OSPR's early WO will be guided by the ACP and will be integrated with the UC as it is formed. As soon as feasible, but in any event after the first 24 hours of a spill, the WBD will direct the development of the wildlife operations element of the Incident Action Plan (IAP) for the review and approval of the UC. Wildlife operations response activities should be described on the "Work Assignment Form" (ICS Form 204) and integrated into the daily IAP to be approved by the UC. The IAP will identify and authorize WO response actions for the duration of the spill.

Activation of the OWCN. The OWCN responds hand-in-hand with the OSPR during WO and, if needed, activation can be virtually simultaneous. Activation may be initiated by OSPR through the Duty Officer at OSPR's Headquarters Operations Center in Sacramento, upon first notification of a spill or at some later point by the WBD or an Incident Commander (IC) in consultation with the UC. Through OWCN, dedicated wildlife operations equipment (such as shallow-water vessels) and specially trained response contractors and personnel can be deployed immediately in combinations dictated by spill-specific circumstances (see Table 2). In consultation with the UC and the WBD, the OWCN Response Director may begin early notification actions of the OWCN response personnel and facilities, placing them on stand-by and enabling them to prepare their facilities. The OSPR and OWCN can be contacted directly, regarding spill notification and WO response, or through the USCG at any one of the following telephone numbers:

CDFG-OSPR Dispatch:	(916) 445-0045
OWCN: General:	(530) 752-4167
	(916) 556-7509
	(916) 523-7941
USCG-National Response Center:	1-800-424-8802
USCG-Marine Safety Office (MSO) San Francisco Port Area:	(510) 437-3073
USCG-MSO Los Angeles/Long Beach Port Area:	(562) 980-4444
USCG-MSO San Diego Port Area:	(619) 683-6470 (day)
	(619) 683-6804 (night)

Role of Area Contingency Plan in Initial Response. Under the terms of a 1997 Memorandum of Understanding (MOU) between the USCG and OSPR (see Section 9960), the ACP shall be used as the primary guidance document regarding natural resource protection in a California spill. Primary responsibility for oiled wildlife protection, rescue and rehabilitation will most likely be delegated to OSPR because of its legal mandates and specialized California wildlife expertise. Key portions of the Area Contingency Plan that will be used to identify wildlife and habitat protection concerns include "Sensitive Site Summaries and Strategies" the "Geographic Response Plans" and the "Oiled Wildlife Response Operations Plan" (this section) and their related databases, which are developed and maintained by OSPR personnel in conjunction with other Area Committee members.

Developing an Initial Action Plan. Upon spill notification the WBD must evaluate a rapidly changing situation and develop an initial action plan, often literally while on the way to the spill site. Often, all the only initial source of information is the PRP's initial report of product, amount, and location, or observations by land managers of oiled wildlife strandings on beaches. It is a rare when all variables (*e.g.*, oil type and volume, location, geographic range of spill, wildlife at risk, etc.) are known prior to on-site reconnaissance. This section describes some of the information and variables that the WBD must consider to create the Wildlife Branch and provide an effective response.

The WBD must evaluate the situation in light of available staff, equipment resources and deployment options within the context of the applicable ACP. In order to determine which resources to

mobilize, many different factors influence the response and must be considered. Some of these factors include:

- Type of oil (including persistence and emulsification properties);
- Quantity of oil;
- Frequency of oil deposition and oiled wildlife strandings;
- Concentrations of wildlife in the spill area;
- Presence of threatened or endangered species and/or critical habitat;
- Potentially affected habitats/ESI Rankings;
- Wildlife resources at risk;
- Human health hazards (Site Characterization);
- Time of Year/Season (*i.e.*, presence of migratory or breeding birds and mammals; and
- Weather and oceanographic conditions.

After reviewing the relevant factors with WO and Planning Section personnel, the WBD can verify the resources at risk; evaluate WO resource needs; assess the available wildlife personnel and equipment resources, and develop initial response objectives, such as identifying the areas with abundant wildlife that must be protected first and the tactics that should be implemented to maximize protection; and deploy wildlife recovery teams to likely stranding locations. Using this information, the WBD can formulate the initial wildlife operations action plan, which will include prioritized response objectives, an immediate call-out and implementation of personnel and equipment, and group and unit designations and task assignments.

While the initial evaluation process is described in some detail here, in practice it may be accomplished in a matter of a few moments, capitalizing on the WBD's experience and prior knowledge of wildlife resources and protection strategies (*e.g.*, hazing). The development of WO initial response strategies and their re-evaluation throughout the spill response, is an iterative, dynamic process that calls for good information, knowledge, experience and judgement.

Tiered Level Response. Activation of personnel and equipment is based on a number of variables as was discussed above, but primarily on anticipated wildlife impacts. In California, WO experiences have been extremely varied, ranging from a catastrophic release during migratory shorebird and waterfowl season; to "mystery" spills with very little oil on the shore, but yet significant seabird impacts; to a more "typical" spill of a few barrels of petroleum resulting in a few dozen wildlife casualties. OSPR has attempted to develop a generalized response table to meet a variety of spills and WO needs. Three basic levels of WO personnel and equipment response are shown in Table 2. Most often WO will mobilize personnel and equipment at the lowest level, *i.e.*, Level I. It is important to note, however, that these categories are not rigid and that the response for each spill should be tailored on a case-by-case basis. Some extraordinary circumstances (*e.g.*, a tanker grounding and rupture, with a known discharge) would justify Level II or III (highest) mobilization at the outset. WO will notify the UC immediately of changes in the deployment of staff and equipment as they occur (see Section 9710.3).

9710.4 WILDLIFE OPERATIONS PROCEDURES

9710.4.1. Prevention of Impacts to Wildlife: Considerations for Implementing Response Countermeasures

The primary purpose of WO is to prevent injury to wildlife or habitats either from the oil spill or from the implementation of response countermeasures. The task of the WBD is to weigh the alternatives at every juncture and identify the potential strategies, including "no action," that will produce the fewest adverse effects to wildlife and wildlife habitat. In conjunction with the Planning Section, the WBD also may be required to evaluate tradeoffs among sites and decide which sites or wildlife resources will inevitably be affected. This will help save wildlife at a different location that may have been assigned a higher response priority (see Section 9973).

Use of Spill Response Countermeasures in Wildlife Areas. The simplest means of protecting marine wildlife from an oil spill is to prevent the oil from reaching areas where they are concentrated, through ongoing coordination with the UC Planning and Operations Sections. In many cases, this can be accomplished by tailoring the use of standard spill response equipment and techniques to wildlife protection requirements. Such countermeasures include mechanical offshore recovery methods, alternative response technologies (ARTs), and shoreline recovery techniques (see Section 4500). The application of these countermeasures, whether for wildlife protection or for other aspects of spill response, should at all times be guided by the sensitivity and vulnerability of the wildlife and habitats in the spill response area. Similarly, staging areas for equipment should be selected carefully to avoid collateral impacts. Such techniques and their wildlife protection capabilities and limitations are addressed elsewhere in this ACP (see Section 4500).

The use of standard spill response countermeasures in areas supporting abundant wildlife creates a risk of adverse effects to wildlife that arise out of, but are not always directly caused by, the spilled oil. Before use, each response strategy proposed in wildlife areas should be evaluated for its potential harmful impacts. The Planning Section and the WBD should weigh the capacity of standard spill response countermeasures to aid wildlife operations against the potential of these same technologies to cause harm to wildlife, selecting the least harmful alternative. For example, if the use of helicopters is considered during response, it is important to establish minimum altitude limits and no-fly zones in environmentally sensitive areas, such as bird colonies and marine mammal haul-outs. All of this must be accomplished in an expedited time frame, consistent with the overall response needs.

Any time ARTs are considered, special attention should be paid to their potential effects on wildlife, their method of application, and monitoring during application. When in-situ burning (ISB) is considered, wildlife within the burn area should be hazed away or captured if they have already become contaminated. Moreover, the application of dispersants over concentrations of birds, sea otters, kelp forests, and other sensitive species should be avoided. Evidence suggests dispersants wash natural oils off feathers and fur, reducing insulation and buoyancy and may be directly toxic to wildlife. After dispersants have mixed with water, the risk is significantly reduced, but not entirely eliminated. Areas where concentrations of wildlife have been observed during reconnaissance flights and other wildlife operations should be eliminated from operational plans when dispersant use is considered.

Human-Related Disturbance in Wildlife Areas. Oil impacted or ill wildlife will not typically strand on a shoreline that has constant human activity, causing them to stay at sea or search for more isolated locations. This delay in stranding causes a delay in capture and subsequent rehabilitation. In order to recover as many spill-affected animals as possible, human disturbance along oiled beaches and shorelines as well as known stranding areas should be minimized. Thus, when feasible, it is advisable for the UC to close such areas to the public, and allow access only to response personnel designated to capture oiled wildlife. Personnel involved in response activities, particularly on islands and along shorelines in the spring and summer months, should be alerted to the presence of nesting birds, bird colonies, pinniped breeding and haul-out areas, and salt marshes, which are vulnerable to the effects of disturbances and trampling. Sensitive areas should be posted and access should be restricted.

Both response personnel and the public should be instructed not to attempt to capture, disturb, or dispose of oiled wildlife. The public should also be alerted (via the Joint Information Center) to leave both live stranded animals and dead animals in place and undisturbed so that they may be retrieved by trained response personnel. The location of live stranded animals can be flagged by response personnel to alert wildlife recovery teams and aid in expedited capture.

Table 2: Recommended Tiered Level Response of Personnel and Equipment for Wildlife Operations

Use as general guide to activate WO resources. This table has been developed from response experience to a variety of spills (*i.e.* oil type and volume, location, season), but is based primarily on expected wildlife impacts as outlined for each tier level. It represents dedicated resources to be provided by OSPR, OWCN and other natural resource trustee agencies. WO resources should be tailored specifically to meet the needs of each incident.

<table>
<tr><td colspan="2">LEVEL I
(Incidents where WO projections are for at least dozens of marine birds impacted;
typically a smaller geographic area with no marine mammals)</td></tr>
<tr><td>Staff and Contractors
Wildlife Branch Director (1)
OWCN Response Director/Veterinarian (1)
Group Leader (1)
OWCN Staff/Unit Personnel (6)
OWCN Regional Facility</td><td>Equipment
Mobile Vet Lab (1)
Wildlife Care Trailer (1)
Vet Truck (1)
One-Ton Wildlife Truck (1)
ATV (2)
Capture/Reconnaissance Boat (1)
Air boat (1)
Wildlife Supplies Trailer w/various Hazing Equipment (1)
GPS Receivers
Cellular phones or radios</td></tr>
<tr><td colspan="2">LEVEL II
(Incidents where WO projections are for up to low hundreds of marine birds, and a few marine mammals):
All of the resources shown in Level I plus:</td></tr>
<tr><td>Staff and Contractors
Deputy Wildlife Branch Director (1)
Group Leaders (2)
Processing Group Team (5)
OSPR & Contract Veterinarian (2)
OWCN/CMMSN Staff (mammals) (6)
Reconnaissance/Recovery/Vet Services Group Staff (15)
OWCN Trained Volunteers (15)
Specialized Wildlife Experts (contractors) (4)
Wildlife Aerial Response Team (3)
OWCN Regional Facility (as needed)</td><td>Equipment
Mobile Vet Lab (1)
Wildlife Care Trailer (1)
ATV (2)
Capture/Reconnaissance Boat (3)
Wildlife Transport Trailer (1)
Wildlife Supplies Trailer (2)
Air boat (1)
DFG Fixed Wing Aircraft (1)
GPS Receivers
Cellular phones or radios</td></tr>
<tr><td colspan="2">LEVEL III
(Incidents where WO projections are for high hundreds or thousands of marine birds and tens to dozens of marine mammals):
All of the resources shown in Levels I and II plus:</td></tr>
<tr><td>Staff
Contract Veterinarian (3)
Group/Unit Personnel (6)
Additional OWCN Facilities (as needed)
OWCN staff and Trained Volunteers (90)</td><td>Equipment
Capture Boat (4)
Air boat (3)
Wildlife Supplies Trailer (1)
ATV (4)
Helicopter Support</td></tr>
</table>

Personnel Safety during WO. Worker safety must be considered before any wildlife reconnaissance, protection or retrieval effort is conducted. The safety hazards that may confront WO personnel include toxic vapors, fire hazard, hazardous weather and seas, unsafe footing and injuries inflicted by wild animals. Therefore, all WO activities must conform to the Site Safety Plan (see Sections 2222 and 9932.1). All personnel involved in WO must have appropriate job-specific safety training for the tasks to be performed. They must be adequately protected with the appropriate personal protection equipment (PPE) (rubber boots, safety glasses, gloves, etc.) and trained in wildlife handling techniques that ensure worker safety and present the least amount of stress to wildlife (Chen Valet and Camlin, 1995). Additional training issues are addressed in the Volunteer Coordination and Management Plan (see Section 9720). The detailed protocols followed by OCWN personnel, describing the capture, transport, and rehabilitation of oiled wildlife are contained in OWCN manuals (OWCN 1998a and 1998b).

9710.4.2 Wildlife Reconnaissance Group

The WO Reconnaissance Group identifies wildlife resources at risk by collecting real-time wildlife species abundance and location information in order for the WBD to develop and implement effective wildlife response strategies (Figure 2). While baseline data, as discussed in Section 9710.2, are essential, variations from baseline conditions, due to daily and seasonal movements of birds and mammals, necessitate rapid, real-time characterization or reconnaissance of wildlife concentrations in the spill area. Depending upon the size and type of the spill and the habitats involved, real-time data will be collected using aircraft, boat and ground surveys. Specific standardized, repeatable methodologies have been developed for each type of survey (ECI, 1992).

The Wildlife Reconnaissance Group is directed by the Group Supervisor (for duties, see Section 3251). The Group Supervisor is responsible for establishing and supervising the Aerial, Boat and Shoreline Reconnaissance Units, and for making survey team assignments. Reconnaissance Group personnel include the Aerial Survey Unit Leader (for duties, see Section 3251.1); the Boat Survey Unit Leader (for duties, see Section 3251.2) and the Shoreline Survey Unit Leader (for duties, see Section 3251.3). Because these units all operate in the field collecting real-time information, it is critical that each team maintain a means of communication to the command post (*e.g.*, Unit leader, a Group supervisor, or WBD).

Reconnaissance Group staff may include professional wildlife biologists, trustee agency representatives, OWCN personnel, the OSPR Aerial Wildlife Response Team (an OSPR contingency contractor), and other trained people. If specialized surveys for threatened and endangered species are needed, the Reconnaissance Group Supervisor or WBD may call in additional wildlife specialists. These specialists will advise the WBD and the UC about threats to listed species, the locations and numbers of oiled animals, and the need for capture, hazing or other protection strategies. These experts will survey on foot or by boat and will use species-specific observation protocols. In 1997 and 1998, for example, such specialists conducted useful surveys of California brown pelicans, western snowy plovers and marbled murrelets during oil spills.

Aerial Survey Unit. The aerial survey team will characterize the abundance, distribution, and species identification of on-water marine birds and mammas in or near the spill area (ECI, 1992). These flights complement, but do not replace, operational overflights for mapping oil. Using a global positioning system (GPS) linked to a laptop computer, the results of observations made on flight transects can be recorded, and in some cases, may be relayed near real-time by radio to a GIS specialist to produce graphical representations of current wildlife concentrations and locations

The OSPR Aerial Wildlife Response Team should make an initial flight covering a broad area of open water that includes the spill location and its likely trajectories. This should be done within a few hours following WO activation. Search patterns usually involve defined transect lines perpendicular to the coast. Such flight transects will most likely be flown in a CDFG twin engine observation aircraft at an altitude of 200 feet. Reconnaissance flights should be repeated each morning and afternoon, or at appropriate intervals based on such variables as wildlife resources at risk, amount of oil on water,

trajectories, weather, or as otherwise directed by the WBD. Such reconnaissance activities should be closely coordinated with Air Operations within the UC (see Section 3220).

Boat Survey Unit. On-water survey teams may be dispatched to assess oiled and at-risk wildlife in offshore or nearshore coastal waters, bays or sloughs. While boat surveys most often involve searching open water areas, they are also frequently used to search shorelines that are inaccessible by land. Teams will characterize species abundance and distribution of wildlife within the spill area. In most cases, personnel will be observing seabirds and marine mammals. Observations of other natural resources such as schooling fish, sea turtles and plankton blooms are also notable. This information is commonly known as "ephemeral" or "time-critical."

Observers will collect information on species present and their condition -- live, dead, oiled and unoiled; basic weather and sea conditions; and any other notable occurrence, which may be useful to WO or the UC response. As a guide, information can be recorded on the Wildlife Reconnaissance Survey Form (see Attachment 1 and Appendix IV) with appropriate notations of the transect location, search time and methods. In some cases, on-water survey teams may also be responsible for collecting dead wildlife and catchable live oiled animals. If this is a designated team assignment, personnel on board must have the necessary minimum qualifications, along with specialized training and equipment needed to capture animals expected to be found. Otherwise, sightings of recoverable wildlife will be relayed to the Recovery and Transportation Group for immediate follow up. In any case, teams must update their chain of command frequently regarding progress, observations, and issues.

Specific search patterns and techniques will depend on the survey type, habitat (*e.g.*, nearshore or bay) and species at risk (*e.g.*, marbled murrelets). In general, searches will be performed at constant speeds, cruising along fixed ladder-shaped or grid-pattern transect lines over a predefined search area. The search area and distance around the spill area will depend on the habitat, weather, sea conditions, water depth, and predicted tides and currents. These factors should be defined before beginning the survey. In small bays and sloughs transects may involve navigating up channels and/or following shorelines.

To effectively document search areas, track information derived from a differential GPS is recommended. Each team should also maintain appropriate communications with the Boat Unit leader, Reconnaissance Group supervisor, and/or WBD via cellular phone or VHF radio. Timely, regularly scheduled reports of observations are essential to keep the UC informed and provide the best possible response.

Boat survey teams should include more than two people for safety and search efficiency considerations. Depending on the boat and search area, two persons are minimum and three are optimal for each boat. In all cases, at least one member of the team must be qualified to operate the boat considering the habitat, weather and sea conditions that exist during the spill. Other personnel must be qualified to observe wildlife at sea and on-water.

Boat survey teams may operate from a variety of craft depending on the habitat and conditions. Any coastal surveys will be done from a boat certified for ocean use and suitable for expected weather and sea conditions. This may include 20 to 30ft workboats, such as Boston Whalers, or inflatable boats. In small bays or sloughs shallow-draft boats are preferred. These may include skiffs, inflatables, airboats, hovercraft, canoes or kayaks.

Shoreline Survey Unit. Shoreline survey team will be dispatched to gather ephemeral or time-critical information via surveys in shoreline areas that are oiled or that is expected to be oiled. These reconnaissance surveys will provide information regarding: biological resources (live and dead; oiled and non-oiled); shoreline habitats; seasonal features such as bird and pinniped rookeries; marine mammal haul-out areas; estuarine mudflats and marshes; streams blocked by natural seasonal berms and rivers flowing to the ocean.

During the initial stages of a spill, shoreline survey teams will be assembled by the WBD. One person on each team will be designated as the team leader. This person will be responsible for decisions relating to human safety and data integrity; for reporting reconnaissance information back to the Unit

Leader, Group Supervisor or WBD prior to each daily pre-planning meeting; and for disseminating the following day's assignment to team members.

The Reconnaissance Group Supervisor or Shoreline Survey Unit leader will assign sections of the coast to survey and tasks to each team (Carter and Page, 1989). Each team should receive survey and reporting instructions. Reporting instructions should include the name and phone number to whom to report findings, as well as specific items which need to be reported, *(e.g.*, live vs. dead species, numbers and/or species of oiled and unoiled resources at risk, endangered and threatened species, etc.). Each team should also receive instructions on the disposition of samples or animals collected, survey forms, and the locations of intake stations. Members of the survey teams should receive a daily phone list for the WBD and his/her alternate at the Incident Command Post, the Group Supervisor, the intake station(s), and contacts to gain access to special or secure areas. Communications must be open throughout the day to provide new direction or report observations up the chain of command.

Survey teams should be provided with data on resources at risk, including environmentally sensitive site and response strategy information from Section 9973, and the Wildlife Reconnaissance Survey Form (Attachment 1 and Appendix IV). All shoreline survey teams should use the same version of each form. Other suggested survey equipment includes proper and necessary personnel protective equipment (PPE);

- Regional maps that include consistent beach names, numbers and access routes;
    - Waterproof notebooks;
    - Binoculars;
    - "Clicker counters;"
    - Cellular phones or VHF radios; and
    - GPS receiver units.

While it is not the primary function of the Shoreline Survey Unit to collect wildlife, Reconnaissance Group teams may be paired with Recovery and Transportation Group teams (at the direction of the WBD or Group Supervisor) to increase the speed and efficiency of shoreline surveys. In such instances, both groups may perform survey and recovery tasks simultaneously. In any case, uncaptured, impacted wildlife sightings should be reported to the Recovery and Transportation Group leader. In past spill responses, attempts have been made to join Wildlife Reconnaissance Teams with Shoreline Cleanup Assessment Teams (SCAT). Because of their different objectives, types of information collected, and the method and speed of surveys, it is not recommended to combine these functional teams.

During moderate-sized spills, survey teams should consist of a minimum of two people for safety and to expedite the surveys, although studies (Roletto et al., 1998) have shown that on long, broad sandy beaches a survey team of three people is optimal for efficiency. Team tasks can be divided among team personnel in any number of ways (*e.g.*, by shore zone, by function, or by expertise). For example, on a two-person team, one member can conduct wildlife observations, recording numbers and species of birds and mammals, both oiled and unoiled, and assessing the potential for capture of oiled wildlife. The second member can investigate the wrack line and shore for evidence of oiling and identification of any dead oiled wildlife.

Walking beaches on foot is the most effective method for locating wildlife with little disturbance. However, vehicle use can also be effective to expedite survey search time, depending on the terrain and the size of the area to be covered. Special considerations pertaining to collateral impacts on wildlife must be addressed before reconnaissance surveys via ATVs are authorized by the WBD. Authorization from the appropriate trustee agencies also must be obtained prior to authorizing any activities using ATVs in national parks and wilderness areas. Because ATVs will potentially haze animals back into the water, caution and planning must be exercised. Close coordination with the Recovery Group should occur so as not haze injured wildlife.

Shoreline survey teams generally are staffed by professional wildlife biologists, who most likely will have previous oil spill and specific coastal field observation experience. At the discretion of the

Reconnaissance Group Supervisor, survey teams also may include qualified OWCN staff and/or trained observers with knowledge and experience in oiled wildlife identification and handling. At a minimum, personnel conducting wildlife reconnaissance should be experienced at identifying species of pinnipeds and California coastal birds, including gulls, alcids, shorebirds and diving birds, and should be able to identify both breeding and alternate plumage in order to determine whether a live bird is oiled. Teams will likely conduct most surveys on foot, however, ATVs are often used which will require additional training.

Use of Reconnaissance Data for Near Real-Time Survey Mapping. Within minutes after receiving data from an aerial, boat or shoreline survey team, a GIS specialist, most likely from the Technical Specialist Unit in the Planning Section or the Wildlife Impact Documentation Unit, can create, and provide to the UC, a map depicting resources at risk on open water and shorelines, using pre-established grid block units. This map will assist the WBD in identifying and ranking wildlife response strategies. For example, site-specific booming or hazing actions may be recommended based on this information. Also, the presence of an especially sensitive wildlife resource in a spill trajectory might prompt or preclude the use of dispersants or other ARTs. The integration of pre-spill (baseline) data and reconnaissance information provide the WBD and the Planning Section Chief with the ability to develop a common understanding of, and strategy to protect wildlife resources at risk during response.

9710.4.3 Hazing Group

Once oiled, habitats that have been traditionally attractive to wildlife may be candidates for hazing actions (Figure 2). If oil-free and disturbance-free habitats are known to be available in the vicinity and continued exposure to oil in the contaminated traditional use areas is anticipated, hazing may protect wildlife from an oil spill by deterring them from entering oil-contaminated areas on water or land (Greer and O'Connor, 1994; Thomas, 1994; USDA 1997a, 1997b, 1997c).

The Hazing Group, which will undertake these activities, is directed by the Hazing Group Supervisor (for duties see Section 3252) who reports to the WBD. The Group Supervisor is responsible for minimizing wildlife impact and losses during spill responses. Other personnel in the Hazing Group may include state or federal trustee agency biologists and university or OWCN personnel with appropriate authorization and training.

If wildlife impacts are deemed to be unavoidable due to the predicted movement of oil in the hours and days following a discharge, then hazing can be initiated with little risk of exacerbating impacts. Hazing should always be considered in heavily oiled habitats, particularly when clean sanctuaries can be designated in the area. Hazing is likely to be most effective when birds are concentrated in coastal lagoons, estuaries and bays. Hazing is likely to be ineffective or counterproductive, however, if the spill area is too large to focus deterrent actions or if animals are likely to be pushed into oiled habitat. Wildlife that has already been oiled should not be dispersed, since this can lead to the introduction of oiled animals into uncontaminated areas and populations. Rather, oiled animals should be captured as soon as practical.

Hazing activities must take place only under the authority and oversight of the trustee agencies, in coordination with the UC. The recommendation to haze will be guided by site-specific and species-specific factors operating at the time of the spill, and by proven hazing techniques. A variety of hazing devices are available and can be deployed to meet the situation, such as propane cannons, cracker shells, alarms and whistlers, flags, predator models, human effigies, and others. These techniques, specialized hazing equipment and special hazing considerations for wildlife are described in detail in the General Wildlife Hazing Plan included in Appendix IIIb.

9710.4.4. Wildlife Recovery and Transportation Group

Wildlife recovery and transportation involves the collection of dead and live oiled wildlife and their transport to processing centers (see Sections 9710.4.5 and 9710.4.6). The Wildlife Recovery and Transportation Group perform these activities, in close coordination with the UC and the State and federal

trustee agencies. The appropriate trustee agency representative(s), such as someone from the CDFG, USFWS or NOAA/NMFS, must approve wildlife collection by any organization, including participating OWCN organizations (see 14 CCR 679(d); Section 9710.2, above).

At any time during the year, a California beach is likely to reveal various marine bird and mammal carcasses or stranded live animals that may or may not be spill related casualties (Stenzel, 1988). It is not feasible, reliable, or practical to attempt to discriminate between spill-related and non-spill-related casualties while conducting beach surveys during the response. For example, scavenged carcasses or dark plumage and wet carcasses that may be spill related are not always identifiable in the field as such. Additionally, seabirds are known to succumb to the effects of oil ingested during feeding or preening even when no oil is apparent on their plumage. Therefore, it is recommended that all animals live and dead be collected and processed for more definitive triage.

Oiled wildlife collection, treatment and rehabilitation are legislatively mandated and are important for spill documentation, humane and public relations reasons (Jessup and Mazet, 1999). In addition, the prompt removal of disabled and dead oiled animals from the environment can be critical to minimize the effects of secondary oiling such as poisoning of predators and scavengers. Appropriate measures must be undertaken by the PRP and the UC to insure that dead animals are collected appropriately, identified, documented and not disposed of until approved by the trustees.

During a spill, the public views any dead animal, regardless of the cause of death, as a problem requiring the attention of response personnel. The problem is best resolved by removing all dead animals. The systematic processing of the collected wildlife provides the UC with the necessary data to make informed statements about the status of affected wildlife and the environmental consequences of an oil spill (see Section 9710.4.5).

The Recovery and Transportation Group is directed by the Recovery and Transportation Group Supervisor (for duties see Section 3253) who reports to the WBD. The Group Supervisor is responsible for the recovery of dead and live, oiled and unoiled wildlife that have been identified by the Reconnaissance Group or other individuals, and for the transportation of affected wildlife to processing/rehabilitation centers. The Group Supervisor should frequently update and coordinate with the Situation Unit of the Planning Section.

Once animals have become oiled, habitat-specific and species-specific strategies to recover and remove disabled and dead wildlife are required. Systematic shoreline surveys for affected wildlife ideally should be carried out several times per day. Preferred search times are before dawn, at dusk, and in the middle of the day. Surveys are often conducted on foot or by boat, however, the use of ATVs and four-wheel-drive trucks can expedite search times. Caution should be exercised with ATVs as they may scare wildlife back into the water or cause the animal(s) to flee the site. Successful captures not only depend on the condition of the animal, but also on the training and experience of the handler, and techniques and equipment used. For detailed and specific information on wildlife capture training, techniques and tools, see OWCN 1998a and 1998b.

Each team should work in pairs and be outfitted with the resources and equipment necessary to complete their assignment. Technological advancements and improvements have been incorporated into the information-gathering phase of this overall task. For example, GPS receivers can now be used to mark locations of collections and survey transects. This GPS information can be downloaded to a GIS specialist who can graphically depict wildlife recovery sites and stranding locations. Additionally, field tag labels with preprinted barcodes can be affixed to live and/or dead animal bags or carriers. The use of barcodes will allow the Group Supervisor and WBD to track the individual animals through the capture/collection, processing, and for live animals the rehabilitation and release process via a computer database. Specialized equipment is identified in OWCN 1998a, 1998b. Other more basic equipment will include:

Proper and necessary PPE;

Dead bird body bags (collection containers);

Pillow cases and pet carriers;

Field tags to label to record collection information and Chain of Custody;

Regional and Segment maps;

Cellular phones or VHF radios;

GPS receivers; and

Basic capture equipment (e.g., nets).

Depending on the spill size, wildlife search, recovery and transportation can be accomplished with combinations of personnel from various WO groups or units. If response circumstances are favorable and properly trained personnel are available, wildlife recovery personnel may be integrated with Reconnaissance Unit teams who perform frequent (at least daily) systematic surveys of beaches/shoreline within the spill boundaries. For example, information on the location of captures and collections of dead and live animals throughout the survey area should be recorded to guide subsequent efforts and inform the UC of impacts to specific geographic areas (see Section 9710.4.5). When live animals are located, transfer arrangements must be made to promptly so transfer teams can take live birds and mammals to an OWCN rehabilitation facility. The timely deployment and coordination of recovery and transportation teams is best accomplished through open radio communications on dedicated frequencies or by cellular phone.

Recovery and Transportation personnel are from the OCWN, OSPR, other State and federal trustee agencies, and approved contractors. As with other WO activities, Recovery and Transportation personnel will include a high proportion of professional wildlife biologists as well as trained, qualified volunteers obtained through the OWCN and/or OSPR Volunteer Coordinators.

Capture and Transport of Oiled Birds. Teamwork is essential to minimize stress in oiled birds (OWCN 1998a). As they lose their waterproofing, many species of birds move to shore, first preening on open beaches and riverbanks and later hiding under cover.

Success at recovering wildlife (especially flightful or mobile individuals) depends on proper technique and timing. Methods used for search and collection will be dependent upon the location of the spill and the modes of transportation made available through the UC. Bird retrieval techniques are most effective if begun shortly before dawn. Qualified teams on foot with handheld nets should retrieve birds. Small projectile nets, linear sections of net placed on the ground and baited walk-in or swim-in traps may also be used. For more information on capture equipment and techniques, see OWCN 1998a.

Handling captured birds poses risks to both handler and birds. Because of the potential for birds to inflict injury on the handler, proper PPE is essential. Eye protection should always be worn. Use of appropriate gloves and outer clothing to prevent oiling of the handler are also important. To prevent further injury to wildlife, the use of proper handling techniques by trained personnel is essential. For details on proper handling techniques, see OWCN 1998a and “Wildlife Handling” in Appendix IIIa.

After capture, birds should be immediately placed in pillowcases or ventilated solid-sided pet carriers, cardboard boxes, or plastic airline kennels for transport. Social, nonaggressive birds (such as common murres) can be placed with one or two conspecifics, but aggressive species, such as loons and cormorants, should be individually housed. Once captured, oiled live birds should be transported to the designated OWCN facility as soon as possible. If marine bird species must be transported for long distances or remain in per carriers for longer than three hours, net-bottomed floors should be used. Since hypothermia is an important biomedical problem which affects oiled wildlife, it is advisable to bring oiled birds into a warm indoor environment as soon as possible, and to transport them in warm ventilated vehicles.

Capture and Transport of Marine Mammals. The need for marine mammal capture should be evaluated on a case-by-case basis by the WBD in consultation with those trustee agencies that have specific regulatory authority: the USFWS, the NMFS, and the CDFG. The protocols that guide decisions to capture and transport marine mammals are described in Appendix Ib and in OWCN 1998b. If oiled

pinnipeds, sea otters, or cetaceans are determined to be ill and require retrieval, capture will be instituted by the WBD in conjunction with the CDFG, NMFS, the USFWS for sea otters, the California Marine Mammal Stranding Network (CMMSN) and the OWCN. Capture and transportation of oiled mammals should be performed only by qualified personnel who have received the appropriate safety training as well as marine mammal handling and restraint training. For more information regarding actual search and collection techniques of marine mammals, see OWCN 1998b.

Generally, the potential benefits of capture must outweigh the potential negative consequences. A decision to capture should consider the size of the individuals and their location with respect to other marine mammals. The method of capture may vary accordingly. While sea otters and fur seals can be immediately and acutely affected by oil, other pinnipeds may be able to withstand some short-term external exposure to oil. Captures will generally be considered for isolated individuals on beaches, spits, tide flats or other relatively flat surfaces, using herding boards and nets (brail, breakaway, or steel frame pole). Less often, captures may be attempted from rock jetties, piers, docks or even in the water for severely debilitated animals. Long-handled dip nets, floating bag nets and a net gun have all been used with some success. Depending on the species involved, aquatic captures may use tangle nets, float nets or Wilson traps. Animals will be placed into kennel carriers or similar cages of an appropriate size, and immediately transported to designated marine mammal care facilities (see Table 1 and Figure 3). Shaved ice or water will sometimes be needed to avoid overheating.

Capture and Transport of Sea Otters. Sea otters are a special case because of their extreme susceptibility to oil and their status as a federally listed species. The capture and treatment of sea otters is addressed separately in Appendix IIIc, the Sea Otter Oil Spill Contingency Plan.

9710.4.5. Wildlife Processing Group

All dead and live wildlife encountered in the spill response area should be retrieved by the Recovery and Transportation Group (see Section 9710.4.4, above) and transported to the wildlife processing center(s), regardless of the condition (degree of decomposition, degree of oiling, etc.) of the carcass or live animal. The Processing Group then logs these animals into the center to receive treatment (live animals) or be placed in storage (dead animals). The Processing Group maintains an accurate record of all impacted wildlife. Each animal is brought to the center and the status and progress of each individual is tracked by the Processing Group through the WO system. This systematic documentation of adverse effects on wildlife will provide an understanding of the short- and long-term consequences of oil spills to wildlife populations and assist in the guidance of spill response actions.

The Processing Group is directed by the Processing Group Supervisor (for duties see Section 3254), who reports to the WBD (see Figure 2). The Group Supervisor, who may be the same as, and will in any event coordinate closely with, the Veterinary Services Group Supervisor, is responsible for establishing and maintaining centralized wildlife processing centers to receive all affected wildlife collected (dead or alive), and documenting and transporting dead wildlife to a secure storage facility (see Live and Dead Bird/Mammal Intake Logs, Appendix IIIa). The Supervisor establishes and directs the operations of both the Wildlife Intake Unit Leader (for duties see Section 3254.1) and the Wildlife Impact Documentation Unit Leader (for duties see Section 3254.2). The Group Supervisor will coordinate unit activities with the Veterinary Services Group and Recovery and Transportation Group Supervisors. Wildlife processing personnel may include trained agency and OWCN scientists and also may be conducted by trained staff under an OSPR contingency contract.

Intake Unit. Depending on the geographic range of the spill and the numbers of animals impacted, one or more wildlife processing centers may be established and directed by the Processing Intake Unit Leader. It is the responsibility of the Processing Group Supervisor to assess the need for multiple centers, and to set up, staff, establish record keeping procedures, and coordinate each center.

Staff in this Unit can include six basic positions at each center: the Unit leader, a Receiver, a Data Collector, a Data Processor, a Photographer, and an Animal Handler. More staff may be necessary if the number of animals entering the center is overwhelming; or less, under light impact situation where staff

can perform multiple duties. For detailed information regarding specific tasks of each position, see the Wildlife Unit Protocols in Appendix IIIa. Since most of the wildlife likely to be oiled are birds, wildlife intake and processing in WO should be conducted by field biologists trained in the systematic collection of information from dead and live birds (Schuster et al., 1998).

With each processing center there will be two sections (live and dead animals), each containing two basic stations (Intake and Processing). As live and dead wildlife comes to the processing center, they enter the Intake Station first. This is where all wildlife is logged in and information regarding the collector should be obtained and recorded on the Chain of Custody Intake Log (Attachment 2 and Appendix IIIa). The Processing Station is where all information necessary to complete either the Live or Dead Bird/Mammal Log is performed, as well as photographing the individual, prior to entering the rehabilitation process or dead animals going to storage. All information regarding wildlife processed through the system should be recorded on standard Live and Dead Bird/Mammal Log Forms (see Attachments 3 and 4, and Appendix IV). Barcodes from field tag labels can be scanned and an immediate identity given to that individual while in the system. Information documented on the forms include such items as: the collection location, species identification, plumage, presence and degree of oiling, injuries, band number if present, degree of decomposition, evidence of scavenging, etc should be noted (Ainley et al., 1994 and Appendix IV). All processing intake personnel should use the Live and Dead Bird/Mammal Log and the Chain of Custody Intake Log forms to ensure consistency of data. In addition, photographs should be taken and feather samples should be collected and preserved for future use if chemical fingerprinting of the oil becomes necessary. These data will help to determine whether or not the birds collected are spill-related casualties, and will provide the UC with sufficient documentation to make timely accurate statements concerning wildlife impacts. More detailed procedures are located in the Wildlife Processing Protocols in Appendix II.

Following intake and documentation, dead animals should be systematically packaged and transported to a secure freezer for storage. In recent years, this location has been the CDFG freezer at the Marine Wildlife Veterinary Care and Research Center (MVCRC) at Santa Cruz. This action will protect the interests of the trustees, the PRPs, and the USCG. If necessary, the carcasses can be re-examined to resolve problems with body counts, species identification or to secure additional samples for investigations. In some instances, necropsies may be performed concurrent with response activities to identify cause of death or disease outbreaks (see Section 9710.4.6). Disposal of the carcasses will occur when the federal and state trustee agencies give the authorization and will be disposed of in accordance with federal and state laws.

Wildlife Impact Documentation Unit. The Wildlife Impact Documentation Unit, directed by the Wildlife Impact Documentation Unit Leader, will maintain the database of information received from the Intake Unit in order to anticipate rates and locations of strandings and establish the status of impacted wildlife. Reports of locations, species and numbers of dead and live animals received are provided to the WBD and the Situation Unit in the Planning Section on at least a daily schedule.

Information from the Live & Dead Bird/Mammal Logs will be summarized for the WBD and UC. In the past, this has been done by hand in a tabular format. With increasing use of GPS, barcodes and databases, we now have the ability to integrate this information into a GIS, and graphically depict collection sites or any other information layer as needed. Currently, the CDFG is developing a spill response database that will allow for the direct input of the Live & Dead Bird/Mammal Logs, Chain of Custody Logs, and patient medical record information. This technology should expedite information summarization and record keeping.

Through this process, the UC can document adverse effects on wildlife resources, communicate this information through the Joint Information Center, anticipate work loads and estimate the duration of the response. This type of documentation is also important for public information. The public often gauges the significance of a spill by the numbers of affected animals. The legislature and the media also demand to know how wildlife has been impacted. The number of dead and live birds is one index. It is important to emphasize, however, that the animals recovered through WO can give only a rough indication of the

kinds of species and resources affected, and that a clear understanding of the magnitude and consequences of spill impacts will necessarily depend upon post-response follow-up studies, an analysis of the data collected during the spill and comparisons with baseline conditions.

9710.4.6 Veterinary Services Group

The Veterinary Services Group within WO ensures that wildlife exposed to petroleum products can receive the best achievable treatment, by providing access to trained personnel and permanent wildlife rehabilitation facilities statewide (see Figure 2 and Table 1). The Group is directed by the Veterinary Services Group Supervisor (for duties see Section 3255), who reports to the WBD (see Figure 2). The Group Supervisor is responsible for activating and maintaining wildlife rehabilitation centers during a response. The Supervisor is also responsible for receiving live oiled wildlife from the Intake Unit (see Section 9710.4.5, above) and processing into the veterinary services/rehabilitation system, which involves conducting triage, treatment, rehabilitation and release. The Veterinary Group Supervisor may be the same as, and will coordinate closely with, the Recovery and Transportation Group and Processing Group Supervisors. In the majority of past spill responses in California, the OWCN Response Director has filled this position.

Bird, Pinniped, and Sea Otter Units. The Group includes three units to handle specialized wildlife rehabilitation issues: the Bird Unit, the Pinniped Unit and the Sea Otter Unit. All of these groups operate under the direction of the Veterinary Services Group Supervisor. The group also coordinates the combined resources and capabilities of the OWCN and any other private wildlife care organizations to provide optimum treatment and rehabilitation services.

Each Unit Leader under the direction of the Veterinary Services Group Supervisor is responsible for receiving live oiled birds, pinnipeds, or sea otters requiring extended care and treatment at established treatment centers, recording essential medical information, conducting triage, stabilization, treatment and rehabilitation (see OWCN Oiled Bird Intake and Daily Progress Forms in Appendix IV). Specific protocols regarding these animals will not be addressed here as they are highly specialized, requiring special permits, expertise and veterinary care. Details can be found in one or more of the following references: OWCN, 1998a in, Oiled Wildlife Care Network: Protocols for the Care of Oil-affected Marine Birds; and OWCN, 1998b in, OWCN Protocols for the Care of Oil-Affected Marine Mammals; and the Sea Otter Oil Spill Contingency Plan (Appendix IIIc); and the interagency agreements (Appendix Ib). The most current information on rehabilitation can be found on the OWCN website at www.vetmed.ucdavis.edu/owcn.

If marine mammals are involved in a spill, the NMFS or the CMMSN can provide assistance with capture and treatment (Geraci and Lounsbury, 1993; Appendix Ib). If necessary, the CDFG-OSPR mobile veterinary laboratory and animal care trailer can be dispatched to the field so veterinarians and staff can perform preliminary examinations and stabilize wildlife prior to being transported to the veterinary facility. Birds can also be examined and stabilized at remote locations in the mobile veterinary lab.

Birds are the most abundant wildlife taken in at the processing centers and are often treated and released within three weeks. However, the time in care depends on the location of the spill, product involved, species, preexisting injuries, and other logistical concerns. When rehabilitated animals are scheduled for release, local wildlife managers are consulted to identify oil-free and disturbance-free release sites. As a part of the spill response actions, birds and mammals are banded or tagged and, in some cases, fitted with telemetry equipment for post-release monitoring. Released birds and mammals that behave abnormally or are noticed by the public may be recaptured if necessary.

Necropsies on selected dead animals may be conducted by wildlife pathologists concurrent with spill response, to inform the response and guide Veterinary Services Group in the treatment of remaining animals. There are several reasons for necropsies during a spill response (Appendix Ib). For example, captivity-related diseases may necessitate necropsies to identify pathogens so that corrective medical actions can be taken (Jessup and Leighton, 1996). Fatalities to apparently unoiled wildlife may

necessitate necropsies to determine if ingestion of petroleum has occurred or if there are other naturally occurring reasons for death (*e.g.* starvation).

Veterinary facilities designed for oil spill response must meet minimal space requirements and incorporate all required aspects of wildlife treatment and rehabilitation activities. An ideal facility should include: an intake/physical exam/evidence processing area; a veterinary hospital with isolation capabilities, indoor wildlife housing/caging, food storage and preparation facilities, animals washing and rinsing areas, indoor drying pens, outdoor pool and pen areas, and pathology facilities; volunteer training/eating area with restrooms; administrative offices with multiple phone/fax lines and conference space; storage; and access to a large parking area.

9710.5 DEMOBILIZATION

Upon conclusion of WO, its activities are demobilized, following standard checkout procedures identified through the ICS and the UC. WO demobilization follows a conclusive determination by the WBD, in consultation with the Veterinary Services Group Supervisor and other WO Group Supervisors that all wildlife affected by the spill have been accounted for. Demobilization of WO groups and units will generally lag behind that of response equipment and personnel, due to variables such as animals remaining in rehabilitative care, the presence of residual oil, and the presence of visibly oiled pinnipeds and free-flying birds. This lag time may last several weeks.

The last resource of the UC to be demobilized will likely be personnel and equipment of the Veterinary Services Group and the OWCN facilities used during the spill. Due to the time involved in the cleaning, treatment and rehabilitation of oiled wildlife, animals that may come into the rehabilitation center late in the response will likely be in care for a few weeks, and so may require care after other response resources have demobilized. In general, the rehabilitation center will continue to operate for three weeks following admission of the last animal into rehabilitation. During that time, as more animals are released and fewer animals remain in care, personnel and equipment resources will be gradually demobilized. After the last animal leaves care, the center should be sanitized and prepared for the next response before closing down.

Attachments

Forms:

1. Wildlife Reconnaissance Survey Form
2. Chain of Custody Intake Log
3. Live Bird/Mammal Log
4. Dead Bird/Mammal Log
5. Codes for Live & Dead Bird/Mammal Logs

Revised: 01/01/00

1. Incident Name: _____ **2. Observation Team**: _____

3. Date: _____ **4. Time Start**: _____ **5. Time End**: _____

6. Segment Name: _____ **7. Segment No.**: _____

8. Survey Length: _____ ft. **9. Survey Width**: _____ ft. **10. Latitude**: _____ N **11. Longitude**: _____ W

12. Survey Mode: Foot ☐ Vehicle ☐ Boat/Ship☐ Airplane ☐ Helicopter ☐ **13. Tide Table Data at Start of Survey**: _____ ft.

14. Weather: _____ **15. Beaufort Scale**: _____ **16. Visibility**: < 0.1 mi. ☐ 0.5 mi. ☐ 1.0 mi. ☐1.0 mi. ☐
(Describe Briefly) (See Chart) (< 160 m) (800 m) (1.6 km) (> 1.6 km)

17. Round Trip Mileage: _____(miles) **18. Round Trip Driving Time**: _____(hours) **19. Trip Prep Time**: _____(hours)

Species Name (See Four Letter Code Sheet)	No. of Animals	Condition Live/Dead	Oiled Yes/No	Scavenged Yes/No	Band or Tag No.	Photo Yes/No	Toe Clipped Yes/No	Comments on Wildlife (recoverable, catch technique, etc.)
Species Name (See Four Letter Code Sheet)	No. of Animals	Condition Live/Dead	Oiled Yes/No	Scavenged Yes/No	Band or Tag No.	Photo Yes/No	Toe Clipped Yes/No	Comments on Wildlife (recoverable, catch technique, etc.)

Revised: 01/01/00

Chain of Custody Intake Log
Oiled Wildlife Care Network/Oil Spill Wildlife Response Team

Date: **Station Number:** **Location/Spill Name:**

Intake Number	Field Personnel	Signature	Phone Number	OWCN/OSWRT Personnel	Signature	Time Received	Species	Collec Locatio

INSERT Attachment 3 - Live Bird/Mammal Log

Station:

LIVE BIRD/MAMMAL LOG

Station Manager:

Revised: 01/01/00

Location/Spill Name:	**OWCN/OSWRT**	Data Collector:
Year of Processing:		Data Recorder:
Page of		Photographer:

Intake No.	Date Coll'ted m/d	Date Arrived m/d	Date Proc'd m/d	Coll'tion Location	Time Proc'd 24 hr	Species	Band Number	Extern. Oil Visible?	Oil not visible but oiled?*	Feather/oil Sample Taken ?	Photo Taken ?	Disp. Status	Disp. Date m/d	Morgue Bag/ Box	Bar Code

*Oil not visible but animal is oiled based on one or more of the following: smell oil, plumage malaligned/parted or sticky, skin wet/not water-proof, skin burns

Station:	**DEAD BIRD/MAMMAL LOG**	Station Manager:

Location/Spill Name:	**OWCN/OSWRT**	Data Collector:
Year of Processing:		Data Recorder:
Page of		Photographer:

Intake No.	Date Coll'ted m/d	Date Arrived m/d	Date Proc'd m/d	Coll'tion Location	Time Proc'd 24 hr	Species	Band Number	Cond-ition	Extern. Oil Visible?	Oil not visible but oiled ?*	%Bird Oiled or Sheened	Depth of Oil	Where Oiled	Feather/Oil Sample Taken ?	Photo Taken?	Morgue Bag/ Box	Bar Code

*Oil not visible but animal is oiled based on one or more of the following: smell oil, plumage malaligned/parted or sticky, skin wet/not water-proof, skin burns

Codes for OWCN/OSWRT Live & Dead Bird/Mammal LOG Forms

Record collection station number and location, year, and get printed names and initials of personnel present at the collection station while the animals listed on the page were processed.

Intake #: Using a different sequence for each station, record I.D. number which animal was given upon arrival.

Date Collected: Record the date on which the animal was collected.

Date Arrived: Record the date on which the animal was brought to the collection station. Include year only if different from year of processing.

Date Processed: Record month and day of processing.

Collection Location: Location from which the animal was retrieved.

Time 24hr: Record the time when processing for this animal began. Use 24hr military format.

Species: Use the standard four-letter abbreviations if the species name is known. If the species is unknown, indicate the lowest taxonomic category that can be determined (i.e. gull; alcid; bird).

Band #: For all recovered birds (live or dead) enter the color and number (i.e. B198 if Blue band #198) or simply the band number (if USFWS band) of the band placed on the metatarsus. If carcass is incomplete, the band can be placed elsewhere (i.e. sternum) or else should be secured to the carcass with string or wire. For turtles or phocids, plastic NMFS tags should be fitted on the hind flipper. For otariids, tags go on front flipper

Condition: (for dead animals only) **1**=freshly dead; **2**=decomposing whole carcass; **3**=body parts only fresh; **4**=body parts only decomposing; **5**=desiccated, mummified carcass.

External Oil Visible: **1**=yes; **2**=no, may be jet fuel, diesel, gasoline, vegetable oil, fish oil or other.

Oil Not Visible But Oiled?: **0**=no; **1**=yes, smell oil; **2**=yes, plumage malaligned or parted; **3**=yes, plumage sticky; **4**=yes, skin wet/not waterproof; **5**=yes, skin burn.

% of Bird Oiled or Sheened: (for dead animals only) **1**=<2% of body; **2**=2-33% of body; **3**=34-66% of body; **4**=67-100% of body covered; **5**=oil detected but extent undeterminable due to state of carcass; **6**=no oil detected but this may be due to state of carcass; 7=was not evaluated.

Depth of Oil: (for dead birds only) **0**=no apparent oil; **1**=superficial; **2**=moderate; **3**=deep; **4**=tar; **5**=not evaluated.

Where Oiled: (for dead animals only) **0**=no apparent oil; **1**=dorsal side only; **2**=ventral side only; **3**=entire body; **4**=bill/mouth area only; **5**=head only; **6**=wings only/fore flippers; **7**=feet only/hind flippers; **8**=more than one area but not entire body; **9**=was not evaluated.

Sample Taken?: Take a sample from oiled locations. If no apparent oil, take samples from areas that are frequently oiled. **0**=no; **1**=feather/fur sample taken; **2**=tissue sample taken. Place a copy of Intake #, species code, band number, processing date, spill event name, and processing station on both the envelope AND foil in which sample is placed.

Photo Taken?: **0**=no; **1**=yes. If yes, attach barcode and write the time it was taken on photo (if Polaroid). In photo itself backdrop should clearly show: date, intake #, species code, and band number, and processing station

Morgue Bag/Box Color/#: Indicate the Color/Number combination of the morgue bag in which the corpse is placed for storage, i.e. Y5 for yellow bag number 5. If morgue bags were placed in boxes for movement or storage, indicate box number here.

Bar Code: Attach bar code sticker.

Notes: Indicate whether any notes have been taken for this animal on the reverse side of the data sheet. On this reverse side write the Intake #; and notes may include any of the following: measurements taken; age, sex or breeding condition if determined; which parts were recovered if body not whole; any conspicuous cause of death if not related to oil (e.g. gun shot wound); and a note if the specimen was known to have been contaminated by other petroleum products (e.g. if it was wrapped in plastic) or other carcasses. Other observations or details of collection can be recorded here.

9720 Volunteer Plan

9720.1 Volunteer Cell Placement Within The ICS Structure

(Please also refer to the Volunteer Guidance Manual)

The Volunteer cell is organized under Resources in the Planning Section. The Volunteer cell will be opened upon decision by the Unified Command and notification to the Volunteer Coordinator. The Planning Section, the Resources Unit or the State IC notifies the SVC that volunteers may be needed or that telephone coverage is needed to inform/update the public about the status of volunteer utilization. The cell can consist of one person and one phone line, multiple people and lines, or an entire Volunteer Operations Center (VOC). It can expand as the need expands. All volunteers (except OWCN program volunteers) will be requested through Planning and Resources Section.

9720.2 Health & Safety

A. Human health and safety is the first priority in decisions regarding the use of volunteers at an oil spill incident.

B. California Code of Regulations stipulates that all persons working with hazardous materials, including crude oil, must receive specific health and safety training. Training courses are described in Section _____.

C. Volunteers will not be utilized to work directly in the recovery of oil. Volunteers will not be assigned to work in areas where there is known a potential health hazard due to chemical exposure such as oil recovery, etc.

9720.3 Responsibility For Volunteers

A. The determination to use volunteers at an incident is the responsibility of the Unified Command.

B. The Volunteer Coordinator oversees the volunteer cell activities at the incident.

C. Volunteers may be utilized by RP's in accordance with their oil spill contingency plan procedures or volunteers may be employed as unpaid state workers for the purpose of workers' compensation by the Administrator of the Office of Oil Spill Prevention and Response (OSPR).

D. A volunteer is covered for workers compensation under the State of California only if the OSPR Administrator (or delegate) has sanctioned the use of the volunteers and the volunteer has been officially sworn in. Individuals independently working at the incident site who do not have approval to do so are not entitled to receive benefits. If there is a responsible party (RP), the RP is ultimately responsible for costs.

9720.4 **Volunteer Coordinators**

A. STATE (SVC)
Office of Oil Spill Prevention and Response
Volunteer Coordinator
Box 944209
Sacramento, CA 94244-2090
Telephone: (916) 323-4731
Fax: (916) 324-8829

*B. AREA (AVC)
(To be selected and listed in each ACP) (Optional)

*C. LOCAL (LVC) (Optional)
(To be selected and listed in each ACP) Optional
Local governments can work together and appoint an area coordinator if local coordinators are not available).

Selection Criteria:

(Refer to the Volunteer Guidance Manual for responsibilities of Coordinators)
Coordinators should be chosen based on availability of staff that meets the criteria. Each area should determine how many coordinators are needed to ensure a program is in place and knowledgeable trained staff is available for volunteer-related incident response. Every city and county does not need to select a local coordinator. However, contact of organizations in the area, development of agreements, and maintenance of a database of trained volunteers when coordinated among several people is more manageable. Of course, staff who are already performing similar functions may be more ideal (OES, Volunteer Centers, Local Govt. Volunteer Coordinators). It is also desirable that the person be interested in the volunteer program and like to network in the community. Other criteria includes:

1. Be available to respond to an incident, if requested.
2. Be familiar with database software or be willing to learn in order to set up a volunteer database if the area or local plans indicate a database of organized volunteers will be maintained.
3. Be able and willing to attend Volunteer Coordinator meetings.
4. Be able and willing to participate in drills that include volunteer issues.

9720.5 Types Of Volunteers

A. Organized - Volunteers who have been registered and trained prior to a spill. OSPR has trained over 100 volunteers in Hazwoper Training. The volunteer's names addresses and telephone numbers are filed for reference. At the time of this writing, it has not been determined whether the database will be maintained centrally by OSPR for the entire state. An alternative is to have a Volunteer Coordinator at each of the area levels with databases for the areas. (Refer to the Section on Coordinator Planning Responsibilities in the Volunteer Guidance Manual).

B. Convergent - Volunteers who arrive at the scene of a spill and who are not previously registered. They may or may not be experienced and trained.

(Members of the public who are volunteering on their own are not recognized as sanctioned volunteers until brought into the Volunteer cell and registered to perform approved tasks).

9720.6 **Volunteer Function Progression Through Stages During An Incident**

The following is an overview of a four-stage process for volunteer activity during an incident:

STAGE I - The Incident occurs and the 800 volunteer number is activated. It is unknown whether volunteers will be needed. SVC does not respond to the incident. A press release is submitted for approval to the UC and Public Information Officer.

STAGE II- SVC reports to the incident and refers the 800 line to the incident.

STAGE III- A VOC is set up and coordinated with area centers if agreement is in effect.

STAGE IV- Volunteers are brought in and registered.

A. STAGE I

1. Incident Occurs

2. OSPR Operations Center is opened.

3. OSPR Operations Center begins taking calls from volunteers and volunteer organizations.

4. OSPR Operations Center notifies OSPR Volunteer Coordinator (SVC) that the 800 volunteer hotline needs to be set up to take volunteer calls.

5. SVC asks for an incident status report to put in the 800 message to report to volunteers

6. SVC calls OSPR Telecommunications Specialist and requests the 800 line be taken off of "message only" status and transferred to the Volunteer Coordinator desk with a new recorded message for "off hours."

7. SVC begins taking calls from volunteers and logging the volunteer's name, address, telephone number and brief background (no extensive screening is done at this time as it is not know whether volunteers will be needed at the incident).

8. SVC releases canned press release and prepares other canned flyers that may be revised for the spill.
A sample press release is included at the end of this section.

B. STAGE II

1. Communication begins between UC and SVC

a. Incident Commander or other UC representative requests the SVC to report to the incident.

b. SVC asks UC rep for the telephone number of the telephone where the 800 number will ring, if known.

c. SVC asks UC representative if volunteers are needed. If yes, perform tasks in Stage II and Stage III. If no, Stage II only.

2. SVC may call either Local or Area Coordinator (if one exists) and ask them to report to the incident to represent the Volunteer Coordinator (the Local and Area Coordinators should be trained prior to being called to represent the SVC. Prior to being trained, they may be called to assist).

3. SVC calls the OSPR Telecommunications Specialist and a) asks to have the 800 number transferred to another line; b) gives the telephone number and approximate time it will be needed (time SVC will arrive at the incident); or c) tells the Specialist that he will be called when the number is known.

4. SVC either transfers calls (if frequent) to the Operations Center while enroute to the incident or lets messages go onto the voicemail (if infrequent) while enroute.

5. If Local or Area Coordinator(s) report to the incident, they coordinate with the SVC on the telephones. The SVC would continue to answer the calls while the Local or Area Coordinator is enroute and then fax the information to them.

6. SVC or representative reports to the incident, checks in through Liaison and Resources and sets up the Volunteer Cell.

C. STAGE III

UC requests OSPR Volunteer Coordinator to set up the VOC. The OSPR coordinator may call in a local or area coordinator to assist or to serve as the Volunteer Coordinator in the Volunteer Cell. (The Volunteer Guidance Manual gives detailed set up instructions).

D. STAGE IV

The Volunteer Coordinator in the Volunteer Cell will refer to the Volunteer Guidelines for procedures for organizing the VOC, working with area volunteer centers and operating the VOC.

9720.7 **Approved Volunteer Jobs and Training Required (Listed By Category)**

The description of each job listed in this chart follows the chart and is titled, "Volunteer Job Descriptions."

CATEGORY of VOLUNTEER JOB and Noted with "C" if appropriate for Convergent Volunteers

TASK **TRAINING**

ICS/VOC

C OFFICE WORKERS AT VOC and other ICS functions - Performs a variety of general office duties in the VOC or other ICS location or at an OWCN facility. needed. See Data Entry Specialist, File Clerk/Office Asst., Interviewer, Accounts Specialist, Administrative Coordinator/Office Manager, Receptionist, Runner, Scheduler/Time Card Asst., Command Center Administrative Specialist; Training Asst., Housing Asst., Transportation Asst., Supply Asst. 2 Hr. Workplace H&S

****REHAB. FACILITY***

C California Conservation Corps (CCC) will be called out first. Volunteers will be called if CCC needs backup. REHABILITATION FACILITY MAINTENANCE SPECIALIST - May include carpentry, plumbing, welding, or electrical to support the OWCN rehabilitation facility as requested. 2 Hr. Workplace H&S

C OWCN Rehab Facility volunteers will be utilized first.
REHABILITATION FACILITY SUPPORT - See Driver, Equipment Cleaner and Rehabilitation Facilities Specialist; Transportation of wildlife and wildlife food; picks up food from suppliers; loads/unloads coolers; scrubs cages, moves equipment, washes vehicles, washes and folds towels used for drying animals. Cleans office areas at OWCN rehabilitation facility. 4 Hr. Hazcom

OWCN Rehab Facility volunteers will be utilized first.
WILDLIFE CARE WORKER - See Wildlife Care Worker, Wildlife Handler/Washer and Wildlife Monitor; May assist with capture and rehabilitation of wildlife; may cut up fish for wildlife. 24 Hr. HAZWOPER

BEACH

BEACH CLEANUP - Removes tarballs 2 Hr. Workplace H&S

OTHER

FIRST AID RESPONDER - Provides emergency first aid for volunteers and other response personnel 4 Hr. Hazcom

DFG will be called first. If not available, volunteer will be given specifics on what to photograph. VOLUNTEER SUPERVISOR - Monitors volunteers to ensure they are following health and safety practices. TRAFFIC MONITOR - Oversees beach (site) access points to ensure only authorized persons enter; ensures habitat protection. PHOTOGRAPHER - Provides photographic coverage of oil spill events for data collection, damage assessment, historical and for future training. 4-Hr. Hazcom 4-Hr. Hazcom 2 Hr. Workplace H&S

*Refer to the Section "Oiled Wildlife Care Network"

9720.8 **Volunteer Job Descriptions**

The following are descriptions of the jobs listed above within various categories.

Accounts Specialist - Maintains files and accounts of expenses attributable to the volunteer effort; communicates with the Finance Section of the Incident Command Center to determine accounting needs and system to be used. SKILLS REQUIRED: Must be detail oriented; experienced with 10-key data entry and be familiar with common

computer software accounting and spreadsheet systems (e.g., Quicken, Lotus 123) highly desirable. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Administrative Coordinator/Office Manager - Oversees office administrative activities at a Volunteer Operations Center (VOC), in the Volunteer Management cell within an Incident Unified Command Center, or other location; supervises work of file and data specialists; oversees development, maintenance and accuracy of computer and paper files of volunteer records; procures and distributes reports and provides updates to the Volunteer Operations Center Coordinator and the State Volunteer Coordinator as required. SKILLS REQUIRED: Good working knowledge of computer word processing and spreadsheet software, as well as excellent organizational, supervisory and communication skills. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Beach Cleanup - Cleanup of tarballs that may appear seasonally on the beaches and rocky shores. TRAINING REQUIRED: Workplace Health and Safety.

Command Center Administrative Specialist - Provides backup and supplemental skills for Incident Unified Command Center staff. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Computer Operator - Enter personnel information into established computer database. SKILLS REQUIRED: Familiarity with computer use. Particular software may be taught on the job if necessary. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Data Entry Specialist - Enters wildlife and/or personnel information into established computer database(s). SKILLS REQUIRED: Familiarity with computer use. Particular software may be taught on the job if necessary. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Driver - Provides ground transportation services as needed; may transport people using a sedan or van; may transport wildlife and wildlife food to various facilities or sites by truck; loads and unloads coolers used to transport animal food; picks up food from the supplier and delivers to facilities; keeps vehicle bed clean. All driving responsibilities require current driver's license, clean driving record, proof of insurance (if personal vehicle is used). TRAINING REQUIRED: Workplace Health and Safety, Site Safety, 4-hour hazcom if transporting wildlife.

File Clerk/Office Assistant - Performs general office tasks; files documents in office (usually at a Volunteer Operations Center) as appropriate; prepares outgoing memos and mail; sends and receives faxes; makes photocopies. SKILLS REQUIRED: Telephone skills, word processing, and development of graphics presentations. Computer spreadsheet/database experience is desirable but not required. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

First Aid Responder - Provides emergency first aid for volunteers and other response personnel. SKILLS REQUIRED: Current First Aid Certification. TRAINING REQUIRED: 4 Hr. Hazcom

Housing Assistant - Works with the Facilities Unit of the Logistics Section to identify housing for volunteers; receives housing requests; procures and distributes housing

materials (sleeping bags, blankets, tents), if necessary; makes housing assignments and maintains expense records related to housing.
TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Interviewer - Works in Volunteer Operations Center (VOC), processing volunteers who arrive in the area or persons referred to the VOC by a county volunteer center; establishes rapport with prospective volunteers to appropriate tasks or jobs based on their experience and current volunteer job needs in the oil spill response effort. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Photographer - Provides photographic coverage of oil spill incident for data collection, historical documentation, and future training purposes. Experience with still photography and/or handheld video photography is required. Experience photographing wildlife, preferably in documentary and fast-action settings is desirable. Personal photographic equipment needed. (DFG photographer will be called first). TRAINING REQUIRED: 24 hour Hazwoper, site safety.

Receptionist - Greets volunteers arriving at the Volunteer Operations Center (VOC) and directs them through the processing stages. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Rehabilitation Facility Maintenance Specialist - May include carpentry, plumbing, welding, and electrical support to the OWCN rehabilitation facility as requested. CCC would be called before a volunteer was called. TRAINING REQUIRED: Workplace Health and Safety.

Rehabilitation Facilities Support Specialist - Cleans animal pens and holding areas; moves equipment as needed; washes vehicles; washes and folds towels used for drying animals; cleans and disinfects carrying cages and other contaminated animal capture and transport equipment, following established protocols. TRAINING REQUIRED: 4-Hr. Hazcom

Runner - Shuttles messages and materials among incident locations, such as between the VOC and UC or to a Rehabilitation facility or other oil spill response sites. Valid driver's license required. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Scheduler/Time Card Assistant - Assures maintenance of sign-in and sign-out records for volunteers; ensures that all volunteers on site are properly cleared and trained (and are not exceeding scheduled hours, in accordance with the Incident Commander's guidance); develops and monitors scheduling to ensure that sufficient volunteers are on hand at all times, according to the needs of the sites, facilities and staffs. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Supply Assistant - Assists with identification of volunteers' logistical requirements and with issue and control of personal equipment and supplies to volunteers deployed to oil spill sites. Experience is desirable in ordering, issuing, stocking, accounting for maintenance and recovery of items of equipment and supplies from user personnel. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Traffic Monitor - Overseas beach (site) access points to ensure only authorized persons enter; ensures habitat protection. TRAINING: 2-hour Workplace Health and Safety, Site Safety.

Training Assistant - Coordinates required training for volunteers; arranges for class presentations by trainers; oversees audiovisual equipment and programming, determines appropriate training and availability for each volunteer; schedules volunteer training sessions to meet multiple training requirements; presents training classes as appropriate. SKILLS REQUIRED: excellent organizational and communications skills. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Transportation Assistant - Works with the Transportation Unit of the Logistics Section to determine volunteer transportation needs including frequency, routing and type of transportation (private car, state vehicle, van, truck, commercial shuttle, bus); determines volunteer drop-off and pick-up schedules for multiple sites; coordinates and verifies appropriate volunteer driver authorizations; monitors vehicle condition and maintenance among vehicles assigned to volunteer use (from government agencies or private industry pools) in accordance with guidance of the UC and maintains appropriate vehicle use records. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Volunteer Supervisor - Monitors volunteers to ensure they are following health and safety practices. TRAINING REQUIRED: Workplace Health and Safety, Site Safety.

Wildlife Care Worker - Captures wildlife. OWCN facility handles. Volunteer is utilized only if OWCN exhausts resources. TRAINING REQUIRED: 24 Hr. Hazwoper, Site Safety.

Wildlife Handler/Washer - Helps move animals in and out of transport carriers; restrains wildlife for veterinary examination and at the wash table; performs repeated washing and rinsing of oiled wildlife. TRAINING REQUIRED: 24 Hr. Hazwoper, Site Safety.

Wildlife Monitor - Conducts behavioral observations on cleaned animals; responsible for monitoring health of one to four animals at a time; keeps detailed records of animal behavior, condition, and overall health; feeds animals; communicates observations and perceptions to animal husbandry supervisor or veterinarian; may also be involved in post-release wildlife tracking and monitoring. TRAINING REQUIRED: 24 Hr. Hazwoper, Site Safety.

9720.9 **Training Course Descriptions**

In the best interests of all concerned, volunteers will be given appropriate training before being assigned. This may cause delays in assignment if the volunteer has to be trained at the spill site, but will avoid needless injuries. Volunteers must be trained to perform the tasks they are asked to do. An inexperienced and untrained volunteer will not be assigned to perform a task requiring training and/or experience.

1. 24-hour HAZWOPER Training - Is for volunteers identified prior to a spill that will back up the Oiled Wildlife Care Network (OWCN) capturing oiled birds and mammals. They would be in the hot or warm zone, within permissible exposure limits. OWCN has primary responsibility for capture and care of oiled wildlife; therefore, other

volunteers will be called in only when the capacity of OWCN is exhausted.

2. 8-Hour annual HAZWOPER refresher training is required for volunteers who have had the 24-hour training. The State Department of Fish and Game, Office of Oil Spill Prevention and Response will provide refresher training for a pre-determined number of volunteers who are identified as OWCN backup.

3. 4-Hour HAZWOPER - If the supply of 24-hour Hazwoper trained volunteers is exhausted and more are needed to backup OWCN at an incident, 4-hour on-scene HAZWOPER training will be given for those volunteers. Individuals trained at the 4-hour level may use this training only once, at a single incident. If the individual finds that they may need to attend future spills, this person must secure training at the appropriate level.

4. 4-hour Hazard Communication (Hazcom) Training - For volunteers who would be a backup in the rehabilitation facility. There is no refresher. The volunteer cannot be in the warm or hot zone.

   The 4-hour HazCom includes:

   -Fundamentals of Toxicology
   -Chemical/physical properties of Petroleum products
   -Physical Hazards (noise, thermal, lifting safety, slips, trips and falls, electrical safety.
   -Biological hazards (zoonotic diseases, soil/water borne diseases; snakes, spiders and insects of concern).
   -Personal protective equipment (boots, gloves, worksuits, safety glasses, hearing protectors).
   -Decontamination of personnel and equipment
   -Reporting injuries, worker compensation forms, and deadlines

5. 2-hour Workplace Health and Safety Training will be conducted onsite for volunteers who will be working in the support zone (not be in the warm or hot zone). For example, tasks could include clerical, phone, pre-beach cleanup, transportation of animals, etc. The 2-hour training includes:
   -Physical hazards (safe lifting; slips, trips and falls; general office ergonomics; general electrical safety.
   -Chemical hazards (toner, disinfectants, rubber cement, etc.)
   -Safe driving
   -Rest breaks/replacement for exhausted workers
   -Reporting of injuries, worker compensation forms, and deadlines

6. Site Safety Training (approximately 5-20 minutes) to orient the volunteer of hazards at the site of the spill.

*HAZWOPER - Title 8, California Code of Regulations (CCR), Section 5192 (It is the same as 29 Code of Federal Regulations 1910.120.

9720.10 **Oiled Wildlife Care Network (OWCN) Rehabilitation Facilities**

OWCN Affiliation to the Volunteer Program -The State of California, Department of Fish and Game, Office of Oil Spill Prevention and Response, has a Memorandum of Understanding with various wildlife rehabilitation facilities statewide. The program is called the "Oiled Wildlife Care Network" (OWCN). The facilities capture, clean and rehabilitate oiled animals.

OWCN Facilities Utilization of Volunteers -OWCN facilities has both paid and unpaid workers and both may be called "volunteers." If they need more volunteers to respond to a spill, the Incident Volunteer Coordinator (Volunteer Cell) may refer volunteers to them to screen for wildlife capture or may screen and refer volunteers to them for backup tasks (building, electrical, wildlife washing, etc.).

How OWCN is activated during a spill -The UC will call the rehabilitation facility directly (through the wildlife care unit).

Paid Vs. Unpaid and Workers Compensation Entitlement - For the purposes of the ACP and Local Contingency Planning, to be entitled for State benefits, the volunteer cannot be a paid worker. If the "volunteer" is paid, the rehabilitation facility is responsible for the volunteer's benefits. If the volunteer is unpaid, the State will cover the benefits. In both cases, as previously stated, the RP is ultimately responsible for costs.

Unpaid volunteers must be sworn in to be deemed a State employee and be entitled to workers compensation, using form Std. 689.

9720.11 **VOC Location**

Each ACP is to insert alternate locations here. The following criteria may help in the selection:

A facility designated should have adequate facilities for central registration, training, assignment, deployment and demobilization of volunteers. The location of the Volunteer Operations Center should be close enough to the focus of activity to be efficient without interfering with site operations. The following should be considered:

1. Estimated number of volunteers expected
2. Types of assignments necessary
3. Locations and times needed
4. Parking
5. Accessible
6. Adequate space for registration, training, etc.
7. Adequate sanitary facilities
8. Multiple phone lines available or can be put in
9. Outlets for fax, and Xerox.

9720.12 **Press Releases**

The initial press release included with this section is revised to fit the incident and released (in Stage I described above) through the Public Information Officer. As the incident progresses and the status of volunteer utilization changes, the Volunteer

Coordinator writes additional press releases and sends them to the Public Information Officer or the JIC manager for approval or editing and distribution to the media.

CONTACT: Cindy Murphy **DATE:**
PHONE: 916-324-6250 **TIME:**

VOLUNTEER HOT-LINE ACTIVATED

(City Name) — In response to the approximate ____-gallon oil spill in/at _____, the California Department of Fish and Game's Office of Oil Spill Prevention and Response (OSPR) has activated the Volunteer Hotline: **800-228-4544**. Hotline staff will record the caller's name, telephone number and applicable skills or training, and let the caller know whether or when volunteers will be utilized for spill response, and other event-specific information as needed.

Federal, State, and local governments, in a cooperative effort, have determined what tasks are appropriate for volunteer effort, have identified and pre-trained an existing group of volunteers statewide, and have developed a system to activate those volunteers. The system will be activated if the Unified Command at the spill decides that volunteers are needed for the response effort. At that time, a volunteer operations center will be established, and if additional volunteers are needed, the hotline listing will be publicized through the news media.

Volunteers and other people are advised to stay away from the spill site, as their presence can hamper clean-up efforts and increase danger factors. Oil is a hazardous material, and to work in or near the oil, one is required to complete 24 to 40 hours of training in Hazardous Waste Operations and Emergency Response (HAZWOPER). Additionally, for the safety of both the public and animals, only trained wildlife specialists should attempt to handle oiled wildlife.

The public can help at this time by reporting any oiled animals to (name of Rehab Facility), at telephone ____, or (name of 2nd rehab facility) at telephone ____. These facilities belong to the statewide Oiled Wildlife Care Network (OWCN), organized and directed by the OSPR, to focus on individual oiled animals and their survival after an environmental disaster. Modern technology, properly equipped facilities, and new care and rehabilitation protocols standardize care throughout the OWCN, increasing survival rates. The less contact any wild creatures have with humans, the better for the animals.

9730 Salvage

This section describes marine salvage.
Note: The Coast Guard Captain of the Port has jurisdiction over vessel salvage situations occurring within his/her zone; this does not preclude any other agencies' interests with respect to spill response.

A vessel casualty and oil spill or potential oil spill, may require the following responses:

(1) Search and rescue
(2) Oil spill containment/clean-up
(3) Fire fighting
(4) Vessel salvage

The first priority in a vessel casualty is the safety of the crew and any other personnel in the area. Secondary concerns are for environmental protection and vessel salvage. A casualty-scene information that will become essential to the early efforts at salvage should be completed by the responders aboard the vessel.

1. Search and Rescue Operations.

The SAR (Search and Rescue) Mission Coordinator (SARMC) will respond by deploying Coast Guard resources. This individual will be the local Coast Guard Group Commander or District Commander whose zone includes the vessel casualty. Upon notification, the Coast Guard will designate the SARMC and respond, as necessary, with on-scene resources.

2. Pollution Response Operations.

The Federal On-Scene Coordinator will ensure pollution response efforts are conducted in accordance with this plan. However, pollution response operations will be accomplished on a not-to-interfere basis with search and rescue operations. While pollution response clearly takes priority over salvage efforts, the two responses may necessarily be conducted concurrently. Salvage operations could be critical to preventing any further discharge of oil. The FOSC will prioritize actions to avoid interference between salvage and pollution response efforts.

3. Fire Fighting.

Refer to section 8000 of this plan and the Local Marine Safety Office Burning Ship Contingency Plan for marine fire fighting activities.
The salvage issues regarding firefighting should be considered while fire fighting activities are being completed. The de-watering, ballasting, and counter-flooding aspects of fire fighting will be coordinated by the FOSC. Follow on issues of hull integrity due to weakening from heat fatigue must be considered in the salvage effort.

4. Salvage Operations.

Salvage is a term used to describe all services rendered to save property from marine peril. This broad definition encompasses not only actions undertaken to save a vessel or cargo, but also includes wreck removal, harbor clearance, and deep water search and recovery.

Salvage includes:

• Providing firefighting assistance.
• Refloating a vessel from a stranding.
• Offloading cargo or water to prevent foundering, or removing sound cargo from impending peril.
• Shoring, patching and making temporary repairs to correct structural, stability, or mechanical problems.
• Rescue towing of an incapacitated vessel to a safe haven.
• Preventing pollution.

Salvage Tug

A Salvage tug is a tugboat equipped to attend to vessels in distress in coastal or ocean conditions, and to render assistance either by towing, provision of pumping equipment, or similar aid. Such tugs historically have been large, powerful, and stationed at high-risk locations for ship traffic.

Rescue Tug

A rescue tug is generally a "tug boat of opportunity", having adequate horsepower or bollard pull strength to assist in controlling a distressed vessel until salvage resources arrive. A rescue tug would generally be capable of providing emergency towing, and quite possibly render a degree of firefighting assistance, since many of the newer tugs are equipped with firefighting water monitors. Rescue towing involves taking an incapacitated vessel under tow at sea and towing it out of harm's way, generally to a safe haven or port, but sometimes for beaching.

Salvage Masters

In order to conduct a proper salvage you must have someone in charge that has the knowledge of how to respond to the specific situation. The person in charge of a salvage operation is known as the salvage master.

A Salvage Master should have direct experience in ship salvage, demonstrating experience in the use of salvage ships and craft, ground tackle, heavy lift craft, cranes and booms, oil pollution containment equipment, and all ancillary types of salvage equipment (e.g. pumps, compressors, welding equipment, etc.). The salvage master acts under the direction of the FOSC; he generally assumes complete control of salvage, harbor clearance, and related engineering operations.

9731 Federal Salvage Resources

9731.1 **Navy Supervisor of Salvage Assistance (SUPSALV)**

In the event that the Responsible Party does not respond to the casualty, the federal government may respond to the salvage requirement, utilizing the services of Navy Supervisor of Salvage. However, financial responsibility remains with the responsible party.

Navy Supervisor of Salvage services may be obtained by:

a. Telephoning Supervisor of Salvage Operations **(703) 607-2758**
After hours and weekends (NAVSEA Duty Officer) **(703) 602-7527**

b. Initiating a message to: CNO WASHINGTON DC//N312/N866//

Add the following if applicable:

//N45// for oil pollution
//N873// for diving support

Info copy to: COMNAVSEASYSCOM WASHINGTON DC//OOC//

Message text should include a brief description of services required; location; urgency; point of contact; and telephone number. If the task is urgent and requires immediate mobilization, the message should amplify this and include a statement that funding will be provided by separate correspondence.

SUPSALVAGE can provide the services of naval architects, may provide the services of naval salvage vessels, and has access to contracts, which will provide the services of commercial salvors and equipment. SUPSALVAGE developed and has available software for rapid analysis of longitudinal strength and intact/damaged stability. The software is known as Program of Ship Salvage Engineering (POSSE).

9731.2 **US Coast Guard Marine Safety Center Support**

Technical support is also available from the Marine Safety Center (MSC) Salvage Team. This group can evaluate vessel stability, hull strength and salvage plans, and may also be available for on-scene assistance. The MSC may be able to provide vessel plans if the ship is U.S. flag. The Federal On-Scene Coordinator may obtain services of MSC by calling **(202) 366-6481** during business hours, or by calling FLAGPLOT at **(202) 267-2100**, after hours. The checklist should be completed and faxed to the MSC at the earliest opportunity. The Marine Safety Center fax number is **(202) 366-3877**.

9731.3 **U.S. Coast Guard Pacific Strike Team**

The Pacific Strike Team can be on the scene quickly to provide initial response assistance with pumps, personnel, pollution control equipment, and miscellaneous salvage hardware. The Strike Team can be contacted 24 hrs a day at **(510) 883-3311**. The National Strike Force Coordination Center in North Carolina can also be notified at **(919) 331-6000.**

9732 Potential threats

The threat is greatest from cargo vessels that carry hazardous materials in large quantities, such as break bulk; containerized cargoes; dangerous liquids; and pressurized or liquified gases. Vessels that are regulated, such as oil tank ships and barges, pose a substantial threat to the marine environment, they have been the main target of federal and state oil spill prevention regulations. Yet, in some cases it is the unregulated cargo vessel that may pose a bigger potential pollution hazard. There are far more cargo vessels than tank vessels, cargo vessels may carry more bunker fuel than the cargo capacity of some oil barges, additionally, cargo or freight vessels may be carrying products far more hazardous in nature than oil.

9733 Salvage Response Considerations

This section describes salvage situations and the general guidelines to follow in responding to a salvage situation. In addition, this section also describes actions to be taken in response to vessel strandings, the relationship between the on-scene coordinator, the responsible party, the vessel's master, and the salvor. Information pertaining to salvage procedures was adapted from Chapter 8 of Volume I of the U.S. Navy Salvage Manual. All parties involved in a salvage response should refer to the manual for specific information relating to salvage techniques.

Salvage efforts may be divided into three phases: stabilization, refloating, and post-refloating. During the stabilization phase, salvors take steps to limit further damage to the vessel, and to keep the ship from being driven harder aground or broaching. Response leaders gather information and formulate a salvage plan; that plan specifies actions to be taken during the refloating and post-refloating phases of the salvage. The refloating phase commences when the salvage plan is executed and ends when the ship begins to move from her strand. During post-refloating, the vessel is secured and delivered to the designated port facility.

Parties involved in salvage response should refer to Chapter 8, Volume I of the U.S. Navy Salvage Manual for specific information relating to salvage techniques.

9733.1 **Stabilization Phase:**

This phase of operations must take into account the potential discharge of oil and hazardous substances into the environment. Upon stranding the Vessel's master SHOULD take the following steps:

1. Have ships personnel report to their emergency stations.
2. Take action to determine the vessel's condition and stabilize the vessel.
3. Secure watertight closures.
4. Notify Coast Guard and vessel's Operations center.
5. Request salvage assistance.
6. Note course and speed at time of stranding.
7. Obtain and provide if necessary, accurate cargo stowage plan.
8. Evaluate the following:
    - Safety of personnel
    - Weather and sea conditions
    - Forecast for change in weather and sea conditions
    - Nature of the sea floor and shoreline.
    - Depth of water around ship
    - Ground reaction
    - Damage to hull
    - Damage to shafting, screws, and rudder
    - Risk of further damage
    - Prospect of maintaining communications
    - Ground reaction
    - Likely draft and trim after refloating
    - Potential for discharge of pollutants

- Position of vital and cargo systems' valves
- The liquid level of all tankage (e.g. fuel, ballast, cargo, etc.)

The Vessel's Master should not:
1. Jettison weight to lighten the vessel in an attempt to back the vessel off.
2. Attempt to back the vessel off when the bottom is torn open.
3. Fail to take action to stabilize the vessel and to determine its condition.

The Vessel's Master should request salvage assistance immediately, and not delay pending the results of an early attempt to refloat the vessel. If the damage assessment indicates the vessel is not in danger of broaching, sinking or capsizing, the master may attempt to back the vessel clear using full engine power on the next high tide.

The Responsible Party should take the following steps:
1. Contact the Coast Guard. Provide a current status of the situation.
2. Implement a Unified Command System response organization.
3. Identify salvage resources available and determine time required for those resources to arrive on scene:
    - Salvage Master
    - Salvage Vessel's
    - Tug Boats
    - Beach Gear
    - Barges with Ground Tackle
    - Lightering Resources
    - Lifting Vessels
    - Appropriate portable cargo transfer pumps and hoses
    - Hull patching equipment
4. Initiate salvage response. Over-estimate the quantity of resources needed.
5. Keep the vessel's master informed of all actions taken.
6. Obtain the services of a Naval Architect.
7. Conduct damage stability and longitudinal strength calculations.

Upon being assigned responsibility for the salvage action, the salvor should:

- Advise the vessel that he (his organization, vessel, etc.) is enroute to assist, and provide ETA (estimated time of arrival) on-scene.

- Ensure that the master is aware of the information covered in the proceeding paragraphs that relates to early attempts to refloat the vessel.

- Obtain all information available regarding the vessel's particulars and details of the stranding. This should include:
    - An accurate position of the stranding (latitude/longitude)
    - Means used to fix position
    - Drafts at time of sailing
    - Estimated drafts at time of stranding
    - Applicable chart numbers
    - Drafts after stranding, with state of time and tide
    - Soundings along side from forward to aft, corrected to datum of the chart of the area
    - Soundings of all tanks and voids, noting changes in contents

- Ships course and speed at time of stranding
- Ships heading after stranding and details of changes
- Liveliness of the vessel in response to swells and surf
- Weather conditions
- Sea and current conditions
- Extent of vessel damage
- Location of grounding points and estimated ground reaction
- Seafloor type
- Status of vessel's machinery and piping systems
- Vessels loading plan or cargo manifest
- Amount and location of hazardous substances
- Locally available resources (tugs, cranes, bulldozers)

Upon arrival, the salvage ship or vessels, and personnel should conduct damage control and position stabilization. Damage control actions may range from augmenting the ship's crew, to conducting firefighting and flooding control. Position stabilization consists of securing the ship at the first opportunity to prevent it from broaching or being driven further ashore.

Prior to developing a salvage plan, the salvor must conduct a thorough salvage survey of the vessel and its immediate surroundings. The survey is defined in the Navy Salvage Manual as being comprised of: the preliminary survey; the detailed hull survey; the topside survey; the interior survey; the diving survey; the hydrographic survey; and the safety survey. The salvor should refer to Section 8-2.6 of Volume I of the Navy Salvage Manual for details. The information should be recorded on the salvage survey form included in Appendix I, Chapter 8, Volume I of the Navy Salvage Manual, or an equivalent.

Based on information received from the vessel, the salvor should evaluate the following:
1. Vessel's original estimates of ground reaction and freeing force.
2. Stability afloat and residual strength.
3. Ship's machinery condition and retraction power available locally.
4. Ship's ability to proceed to a safe haven after refloating.

The salvor should then advise the master based on these evaluations, and takes the following steps to mobilize the salvage force:
1. Determine personnel and material required
2. Collect information about the stranded ship. Sources include:
    - Owner
    - Vessel's classification society
    - Coast Guard
3. Ensure needed navigation material is on board.
4. Begin recording written record of information and actions taken.
5. Ensure that salvage vessels enroute will be prepared to respond upon arrival to the stranding site.

Upon arrival (in coordination with the response organization/OSC where applicable), the salvage master should conduct damage control and stabilization. Damage control actions may range from augmenting the vessel's crew for firefighting and flooding control. Position stabilization consists of securing the vessel to prevent broaching or being driven further ashore. The salvor must then, in preparation for the development of the salvage plan, conduct a thorough salvage survey. This survey is defined and described in the Navy Salvage Manual, Volume 1 Section 8-2.6, as being

comprised of the preliminary survey, a detailed hull survey, a topside survey, an interior survey, a diving survey, a hydrographic survey and a safety survey. The information gathered during the surveys should be recorded on a survey form as found in Appendix of the aforementioned manual.

1. Basic information identifying the ship's characteristics and the condition of the stranding.
2. An analysis prepared by the salvor and naval architect, which provides estimates of:
    - The ground reaction
    - The freeing force
    - Location of the neutral loading point (point at which weight can be added w/out change in ground reaction)
    - Stability - grounded and afloat
    - Strength of hull girder, damaged areas, attachment points, and rigging
    - A summary of the engineering rationale employed for selection of retraction and refloating techniques
    - Hydrographic information
    - Potential pollution risks
3. List of specific safety hazards involved
4. Potential pollution risks
    - Lightering Considerations
    - Booming Considerations
    - Standby Equipment
5. Means for controlling interference between pollution response efforts and salvage efforts
6. Appendices that provide detailed information regarding techniques to be employed.
7. Location to which the vessel will proceed following refloating.
8. Means for controlling the vessel as it is freed.
9. Vessel escort, if any, to be employed.
10. Means for delivering vessel to destination (tow, own power).
11. Any preparation of vessel necessary to gain permission for entry into port of destination.
12. Means of disposal, if other than above.

9733.2 **Refloating Phase:**

The salvage plan is implemented during this phase. The plan should be considered a flexible working plan with appropriate changes made in response to changing conditions. During this phase, all parties must be in close communication, and the process should be brought to a halt if significant safety problems develop. The salvor, responsible party, and the Captain of the Port have the authority to stop salvage operations in this case.

Consideration to assuring that the problem will not be made worse must be addressed thoroughly. In the case of a heavily damaged vessel, the risk to the port and the environment may not warrant allowing the vessel to be brought into the harbor. In some cases, it may be desirable to allow the vessel to sink in deep water to mitigate environmental damage, or minimize risk to life. Obviously, these are decisions that will have all parties in the salvage effort fully involved, and the FOSC must take the lead to assure that the best management of the incident/threat is achieved.

Working with the Responsible Party and the naval architect, the salvor must develop a salvage plan. The plan must detail actions to be taken and resources to be used, and it must set organizational responsibilities and the anticipated schedule. **After the plan is prepared and**

prior to initiating salvage operations, the Responsible Party must submit the plan to the Federal On Scene Coordinator or his designated representative, for review. The Federal On Scene Coordinator will review the plan, and approve or disapprove it based upon real or potential risks to port safety and the environment. Any plans for the intentional jettisoning of cargo will be reviewed as part of the salvage plan.

9733.3 **Post Refloating Phase:**

(1) This phase commences when the ship begins to move off the strand, and is completed when the ship has been delivered to a safe haven or repair facility. In addition, salvage resources and equipment should be removed from the salvage site. The options for disposal of the vessel include:

- Steaming into port, or to another location within the port
- Towing to safe haven
- Anchoring in preparation for tow or temporary repairs
- Beaching if the ship is in danger of sinking
- Scuttling or sinking

(2) The following salvage plan items are to be updated, as necessary, following refloating:

- Overall seaworthiness
- Vessel's bottom, for damage hidden by the strand
- Condition of piping systems and machinery
- Condition of all ship's systems necessary for the transit
- Ship's stability, list, and trim (may necessitate loading or shifting of weights)
- Patching and pumping arrangements for compartments in way of damage
- Towing bridle, day marks, and navigation lights (an insurance line should be rigged even when the ship proceeds under its own power)

(3) Following this phase, the Responsible Party shall submit a completed form CG2692 to the Officer in Charge of Marine Inspection and submit all requested information to the Senior Investigating Officer of the Marine Safety Office.

9734 **Salvage Response for Other Than Strandings.**

Salvage assistance may also be required for vessel sinking and rescues (towing). In these cases, the relationships between the various parties remain the same as for strandings. For sinking, the salvor must focus on methods for refloating the vessel, and vessel stability as it is refloated. For rescue situations, development of a comprehensive salvage plan may not be necessary. Use of good marine practice in establishing and maintaining the tow, and coordination with the vessel's master, tow vessel, Coast Guard SARMC, the Captain of the Port, and the vessel's owner/operator may suffice. In either of these cases, the user of this plan should follow the guidelines presented, adapting them to the specific salvage requirements at hand.

9740 NRDA PROCEDURES

9741 Introduction

The overall goals of the natural resource damage assessment (NRDA) process are to restore the injured natural resources to pre-spill conditions and to obtain compensation for all documented losses and is a separate process from response. In general, this process may require several phases to complete, including the individual phases of documenting injuries, assessing damages, settling claims, and undertaking restoration programs. This document addresses the NRDA process only during the initial stages while response efforts are underway. This document attempts to describe the NRDA process, identify the principle participants in NRDA activities, and clarify the relationship of NRDA within the framework of the Incident Command System (ICS). Additional information is provided concerning funding for NRDA activities and the requirements for specific federal, state, and local permits necessary to collect information for assessments of natural resource damages.

It is highly desirable for natural resource trustees to coordinate their NRDA activities and to consult with local governments and interest groups from the affected area to produce a single NRDA for all injuries to public trust resources. The trustees are encouraged to coordinate these activities with the efforts of a cooperative responsible party (RP) to the extent that trustee responsibilities are not compromised.

9742 Background And Structure

Significant oil spill incidents initially lead to two primary actions: a response to contain and cleanup the spilled oil, and an assessment of the injuries to natural resources caused by the pollutant. In 1990, Congress enacted the Oil Pollution Act (OPA 90; 33 U.S.C. 2701 et. seq.). OPA 90 authorizes Federal resource trustees (Department of Agriculture, Department of Commerce, Department of Defense, Department of Energy, Department of the Interior), State resource trustees (designated by the governor of each state), federally-recognized Indian tribes, and foreign trustees to seek compensation for injuries to natural resources caused by the discharge of oil. For purposes of this document, these groups are referred to as either “trustees” or “trustee agencies”. In California, the Governor has designated the Secretary of the Resources Agency and the Secretary of the California Environmental Protection Agency as the State Trustees for natural resources within their purview. The Lead State Trustee generally is selected based upon the types of natural resources affected by the spill.

Damage assessments for natural resources shall be coordinated by representatives from each of the trustee agencies with affected resources. These trustee agencies typically work as a team to develop a single approach to the assessment process. The “NRDA Team” consults with members of government and interest groups from the affected area to address local concerns. Cooperative RP(s) may be invited to participate with the NRDA Team activities to develop one unified NRDA plan for public trust resources. A cooperative damage assessment could reduce costs by eliminating parallel assessments by the trustees and the RP. However, due to the statutory responsibilities, the trustees must maintain management and oversight of any cooperative damage assessment.

9742.1 **NOAA Regulations**

The National Oceanic and Atmospheric Administration (NOAA) promulgated final regulations for NRDA of injuries resulting from a discharge of oil (15 C.F.R. Part 990). NOAA published the final rules on January 5, 1996 in the Federal Register (61 Fed. Reg. 440). These regulations supersede the Department of the Interior's (DOI) NRDA regulations (43 C.F.R. Part 11) implementing portions of the Comprehensive Environmental Response, Compensation and Liability Act (42 U.S.C. 9601 et. seq.) (CERCLA) and the Clean Water Act (33 U.S.C. 1251 et. seq.) (CWA) for oil spills. Any assessment of damages prepared in accordance with the regulations promulgated by NOAA shall have the force and effect of a rebuttable presumption of correctness on behalf of the trustees.

In addition to the final NRDA rule, NOAA has developed guidance documents covering various aspects of the NRDA process. The NOAA rule has similar advantages to the DOI rules but is more specific to oil-related injuries and the dynamics following an oil spill incident.

9742.2 **California's Oil Spill Prevention and Response**

The California Lempert-Keene-Seastrand Oil Spill Prevention and Response Act (OSPRA) was enacted shortly after OPA 90. Under OSPRA, spillers are held strictly liable for damages, including natural resource damages, resulting from a discharge of oil into marine waters of the State. Damages can be sought under federal or state law or both but may be claimed by trustees only once. Double recovery of damages is not permitted. Hence, it is imperative with spills of significance that Federal and State trustees consider the interests of affected local governments and coordinate claims for all public trust natural resource damages. The monetary damages based on NRDA activities are compensatory in nature to the public and, therefore, are separate from fines and penalties that are largely punitive to the responsible party.

9742.3 **CERCLA and Clean Water Act**

CERCLA, enacted in 1980, authorizes Federal and State governments and federally recognized Indian tribes to act as public trustees of natural resources and pursue damages from the RP(s) for injuries to natural resources caused by release of a hazardous substance. Section 1321 of the Clean Water Act authorizes the trustees to assess damages to natural resources caused by a release of oil. Pursuant to CERCLA and CWA, the DOI promulgated the first NRDA regulations ("DOI Rules") establishing procedures that trustees may follow. The procedures, as modified by *Ohio* v. *U.S. Dept. of the Interior*, 880 F.2d 432 (D.C. Cir. 1989) and *Colorado* v. *U.S. Dept. of the Interior*, 880 F.2d 481 (D.C. Cir. 1989), provide guidance for measuring injuries to natural resources and quantifying damages (dollars) for the injuries.

The DOI issued a revised final NRDA rule for Type B assessments on March 25, 1994 (59 Fed. Reg. 14262) and a proposed rule for economic valuation on May 4, 1994 (59 Fed. Reg. 23098), in response to the Ohio decision. The DOI also issued a revised Type A (simplified) assessment rule on May 7, 1996 (61 Fed. Reg. 20560). The overall framework set forth in the DOI rules is the basis for NOAA's NRDA regulations. It is also important to understand the procedures and standards set forth in the DOI rules because CERCLA still applies to oil spills in which the oil is mixed with a hazardous substance as defined in 42 U.S.C. 9601(14).

9742.4 **Assessment Procedures**

The assessment procedures set forth in the DOI rules are not mandatory. However, they must be used by trustees to obtain a rebuttable presumption that a specific assessment of damages is correct. The DOI rules set out two types of assessment procedures. The "Type A" procedure uses a computer model to calculate damages and is a simplified assessment process. The "Type B" procedures involve more comprehensive assessment activities but may be tailored for individual cases.

Five steps are described in the DOI rules for determining and quantifying injury to resources and assessing monetary damages. The steps include: (1) conducting an initial preassessment; (2) conducting a preassessment screen; (3) preparing an assessment plan; (4) conducting the assessment following either the "Type A" or "Type B" rule; and, (5) preparing a post-assessment report. Although the regulations provide the option for the trustees to use either "Type A" or "Type B" procedures in a given case, both may be employed in practice as long as there is no double recovery of damages. The speed and simplicity of the "Type A" procedures may prove useful for certain spills or types of injury, whereas the "Type B" procedures may be used if a full assessment is warranted.

NOAA has identified three phases to a damage assessment: (1) Preassessment; (2) Restoration Planning; and, (3) Restoration Implementation. If injuries to natural resources or the services provided by natural resources are expected to continue following response actions, and feasible restoration alternatives exist to address those injuries, then trustees may proceed beyond the Preassessment phase to Restoration Planning and Implementation.

9742.5 **Injuries and Lost Services**

Initial steps in the NRDA process require documentation of a pathway for the spilled oil, demonstration of oil exposure (direct and indirect) with specific resources along the pathway, and quantification of the injuries caused by the spilled oil. Natural resources and/or the services provided by such resources may be injured or disrupted through direct or indirect exposure to released substances.

The methods used to assess the injuries arise largely from scientific practices and best professional judgement. The DOI rules and NOAA rule provide guidance on specific types of biological injuries (e.g., death, physiological malfunctions such as decreased reproductive capacity) that may be used to claim damages. The scope of possible injuries extends beyond impacts to single organisms and may include effects on populations, habitats, and ecosystems. "Services" include physical and biological functions provided by the natural resources to the ecosystem as well as other functions related to human use of the resources. Production of food, protection from predators, maintenance of community diversity, and provision of habitats are examples of some services provided to the ecosystem or its constituents. Examples of services provided to humans by natural resources include recreational opportunities such as fishing, wildlife viewing and beach activities. Other services provided by resources to humans are often less visible and can relate to the knowledge that a resource exists and is healthy or will continue to exist for the benefit of future generations.

9742.6 **Preliminary Damage Estimates**

Expected damages should be estimated as soon as possible to determine the potential scope of the case and the prudence of undertaking certain types of studies. Preliminary damage estimates should include: (1) the reasonable costs of injury assessment, (2) the cost of restoring, rehabilitating, replacing or acquiring the equivalent of the injured resources; and, (3) the value of interim losses including both direct use (e.g., recreational) and passive use (e.g., existence value) of resources pending restoration or natural recovery.

9742.7 **NRDA Process**

Successful pursuit of NRDA actions, either by the trustees alone or in cooperation with the RP(s), is a complex process comprising numerous tasks that generally involve the interaction of scientists, economists, lawyers, and administrators. The DOI rules and NOAA rule reduce some of the complexity by establishing an assessment process and providing a mechanism for determining the merits of going forth with the assessment and claim. The process provides a record of the trustees' decisions.

Other advantages to following the federal regulatory assessment processes may warrant use of the procedures. Results obtained by following the DOI and NOAA rules are presumed correct. The rebuttable presumption shifts the burden of proof to the party challenging the correctness of those results. Additionally, these rules provide national standards on injury measurement, describe methods for quantifying natural resource injuries into monetary values, and assist trustees in planning restoration of impacted resources.

9743 NRDA and the ICS

The Incident Command System (ICS) is an organizational framework designed to efficiently and effectively manage personnel and resources during emergency incidents. The system is designed to be adaptable to any size event, and can be changed in structure to conform to the needs of the response. One objective of the ICS is to reduce or eliminate the duplication of efforts by the numerous response agencies while attempting to control or contain the spill and mitigate possible impacts of the spilled oil. A small group consisting of the On-Scene Coordinator (OSC), the State Incident Commander (State IC), and a representative of the RP form the Unified Command (UC), coordinates and directs the actions of the response.

Concerns of the affected local governments related to spill response or cleanup are generally presented to the UC through a Multi-Agency Coordination (MAC) group representative. The local government claims for spill damages associated with services provided by natural resources should be coordinated with the Trustee NRDA Team to avoid overlap within assessments. For additional details on the ICS consult Annex B, Appendix II, of the Area Contingency Plan.

Assessment of injuries and damages resulting from spilled oil need to begin as soon as possible following the initial release of the pollutant. This necessitates that NRDA activities be conducted simultaneously with response efforts and coordinated through the UC. Portions of the NRDA process should be integrated into the ICS to improve communication, expedite both response and NRDA activities, and make efficient use of personnel and equipment. To avoid

potential conflicts in duties, it is recommended that members of the NRDA Team not have responsibilities for the spill cleanup or general response activities.

The primary role of the NRDA Team is to document a pathway for the spilled oil, measure levels of injuries resulting from the spill, and determine damages. The UC, in contrast to the NRDA Team, focuses primarily on response, cleanup, and minimizing impacts of the oil spill. Although the UC and NRDA Team often have different responsibilities and needs, some of their activities overlap and require coordination. Examples of activities to be coordinated immediately following a spill include collecting samples (e.g., access to restricted sites, sampling prior to cleanup), gathering information pertinent to measuring actual or potential adverse changes to natural resources, using equipment (boats, helicopters, etc.), communications, surveying spill sites, identification of protective measures and potential need for emergency restoration.

Uninterrupted communication between the UC and the NRDA Team is essential to ensure that needs and efforts of the NRDA Team are not in conflict with response strategies and activities selected by the UC. Information concerning, for example, the spill trajectory forecasts, cleanup strategies, and beach and port closures should be made available to the NRDA Team to assist sample and data collection in a timely fashion. Conversely, information concerning potential injuries to natural resources caused by oiling or response techniques should be made available to the Planning Section before implementation of cleanup responses by the Operations Section.

It is important to note that the RP is part of the UC but may not necessarily be part of the trustees' coordinated NRDA activities. For this reason, the NRDA Team must remain separate from the ICS to ensure that statutory responsibilities of the trustees are not compromised. The trustees retain the option of inviting the RP to participate in all or part of the damage assessment process. Some NRDA activities, however, are best coordinated through the UC. The NRDA Team will provide a Representative(s) to the Liaison Officer of the ICS to present the needs of the NRDA Team and other response information to the incident command. The NRDA Representative(s) will also act as historian or recorder of information critical for an accurate assessment of spill damages and will attend appropriate incident command meetings to secure knowledge of the up-to-date response activities.

9744 Notification Procedure for Initiating NRDA

In the event of a spill, each trustee is responsible for notifying its own members of the NRDA Team. Individual federal, state, and local agencies may be notified through various channels depending on the size and location of the spill. In all incidents that might require NRDA action, the Office of Spill Prevention and Response (OSPR) of the California Department of Fish and Game (CDF&G) will attempt to notify representatives from each of the trustee agencies expected to participate in the NRDA process.

9745 Identification of Lead Administrative Trustee

Executive Order 12777 (October 22, 1991) requires the federal natural resource trustees to select a representative as the federal lead administrative trustee (LAT). In general, the LAT serves as the federal contact for all aspects related to damage assessment, resource restoration, and federal funding for NRDA activities. Depending on the resources affected and other relevant factors, it might be appropriate for most administrative duties to be undertaken by a lead trustee

from a non-federal agency. In such cases, a federal LAT would still be selected to work with the representatives of the Oil Spill Liability Trust Fund to secure federal funds to initiate the damage assessment. The non-federal lead trustee would coordinate all other administrative duties regarding damage assessment activities. This lead trustee or trustee agency shall be selected by consensus of all participating trustees. The trustees will notify the Coast Guard of the federal LAT selection and, when applicable, non-federal lead trustee as soon as possible after oil spill.

The trustees intend to execute a general Memorandum of Agreement (MOA) to coordinate their damage assessment and restoration activities. Among other things, the MOA will identify trustees, establish criteria for selecting the LAT, and provide procedures for decision making between the trustees signing the agreement.

9746 Funding Issues

9746.1 Oil Spill Liability Trust Fund (OPA Fund)

The federal LAT will contact the OSC or his/her representative to secure money to initiate the assessment of natural resource damages following an oil spill. The LAT will provide an outline jointly agreed upon by the participating trustees describing funding needs and how such funds would be allocated among the trustees. Each participating trustee will provide documentation of all expenditures, costs, and activities. The LAT is responsible for coordinating the submission of all such documentation to the representatives of the OPA Fund.

9746.2 California Oil Spill Response Trust Fund

If the federal funds are not available, or will not be available in an adequate period of time, and an RP does not exist or is unable or unwilling to provide adequate and timely payment for cleanup and damage assessment activities, the State Administrator of OSPR may access the California Oil Spill Response Trust Fund (COSRTF). Money from the COSRTF may be used to cover State damage assessment costs.

9746.3 Contacts With Responsible Party(ies)

The trustees will need early access to representatives of the RP(s) to determine the availability of funding, personnel, and equipment for damage assessment activities. The federal LAT or non-federal lead trustee will first notify the appropriate representative of the USCG or UC and request a meeting between the trustees and the RP's representative. Should the USCG or UC fail to arrange a timely meeting, the trustees will establish contact directly with the RP's representative.

9747 Supporting References

CASES

1) *Ohio* v. *United States Department of the Interior*, 880 F.2d 432 (D.C. Cir. 1989).

2) *Colorado* v. *United States Department of the Interior*, 880 F.2d 481 (D.C. Cir. 1989).

3) *Kennecott* v. *United States Department of the Interior*, 88 F.3d 1191 (D.C. Cir. 1996).

GUIDANCE DOCUMENTS

1) NOAA. 1996. Natural Resource Damage Assessment Guidance Document: Pre-assessment Phase (Oil Pollution Act of 1990). National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD.

2) NOAA. 1996. Natural Resource Damage Assessment Guidance Document: Specifications for Use of the NRDA/CME Version 2.4 to Generate Compensation Formulas. National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD.

3) NOAA. 1996. Natural Resource Damage Assessment Guidance Document: Injury Assessment (Oil Pollution Act of 1990). National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD.

4) NOAA. 1996. Natural Resource Damage Assessment Guidance Document: Primary Restoration (Oil Pollution Act of 1990). National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD.

5) NOAA. 1996. Natural Resource Damage Assessment Guidance Document: Restoration Planning (Oil Pollution Act of 1990). National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD.

6) NOAA. 1997. Natural Resource Damage Assessment Guidance Document: Scaling Compensatory Restoration Actions (Oil Pollution Act of 1990). Public Review Draft. National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD.

REGULATIONS

3) 40 C.F.R. 300.600 (Identification of Federal Trustees; CERCLA)

4) 40 C.F.R. 300.605 (Identification of State Trustees; CERCLA)

5) 15 C.F.R. Part 990 (NOAA NRDA rule - see 61 Fed. Reg. p. 440 et.seq.)

6) 43 C.F.R. Part 11 (DOI rules - see 59 Fed. Reg. p. 14262 et. seq.)

STATUTES

7) Government Code section 8670.1 et. seq. (OSPRA)

8) Title 14, California Code of Regulations, section 679(d)

9) 33 United States Code 1251 et. seq. (Clean Water Act)

10) 33 United States Code 2701 et. seq. (Oil Pollution Act of 1990)

11) 42 United States Code 9601 et. seq. (CERCLA)

9750 Public Affairs Procedures

9751 Check-list for Public Affairs Response to Pollution Incidents

1. Where a potential risk to the health & safety of local communities exists, consider coordinating an **EDIS** broadcast through the local Office of Emergency Services (OES).

2. The Federal On-Scene Commander (FOSC) designates an incident **Lead Information Officer (IO)** — generally a Public Affairs Officer (PAO) from either the Coast Guard or DFG-OSPR, experienced in California spill response. Ensure that all PAOs know who the IO is, and understand that they report to him or her. The IO reports directly to the three Unified Commanders.
3. Complete a basic fact sheet and prepare a 30-second **media statement** (about 150 words, maximum).

4. Establish **Joint Information Center (JIC)** if the size or impact of the incident generates enough media or public interest in the spill and response. (Also see Section **2221.1** for additional JIC information.)

5. Contact district (Pcp) and DFG-OSPR at outset of any medium-to-large spill to arrange for **PA back-up**. (See Section **2221.2** for contacts and phone numbers).

6. Establish **phone bank** for answering media calls (on large spills, consider staffing on 24-hour basis during initial crisis), and deploy adequate PA staff to answer all incoming phones.

7. Have a minimum of four **phone lines** available for public affairs use: Two each, incoming (published) and outgoing (unpublished) phone and FAX.

8. Schedule media **availability with the FOSC** at least daily when media interest is great. Preference is immediately following UCS operations meeting. This allows the three key parties (FOSC, SOSC & RP) to attend and field questions.

9. Contact the Coast Guard's National Strike Force Coordination Center (**NSFCC**), Public Information Assistance Team (**PIAT**) to alert for back-up, in case of any potential major incident. Note: FOSC may request PIAT at any time, regardless of spill size. (See Section **5612.3** for information and phone contact for PIAT)

10. In major spills, designate a **Protocol Officer** to handle VIP visitors. Do not, under any circumstances, assign this function to the Information Officer or JIC staff as a collateral responsibility.

9752 Suggested Equipment Needs for JIC/Public Affairs:

1. Minivans (six passenger or greater) and a fuel-purchase card.
2. FAX machines (two or more)
3. At least four modem-quality telephone lines (incoming & outgoing phone & FAX, + modem)
4. Complete computer system (including printers, modems, & software)
5. Office supplies (paper, pens, file folders, tape, paper clips, push-pins, easels, felt pens, etc.)
6. Desks, chairs, file boxes, erasable white boards, pens, & erasers
7. Cellular phones, batteries, & charging units
8. VHF-FM radios (at least one)
9. Scanners for VHF-FM (to monitor response activities)
10. Voice Pagers
11. Photocopiers and paper
12. Televisions/VCRs
13. Podium w/PA system (for news conferences)
14. Charts, maps, and a way to display them (easels, tape to walls, magnets, etc.)
15. Bulletin boards / Erasable boards and supplies
16. Answering machine (for nights when JIC is not staffed)
17. AM-FM Radio
18. Pain relievers (aspirin, acetaminophen, and ibuprofen)
19. Bottled water, coffee, juices, soft drinks (caffeine)
20. VCR and monitor on tall, movable stand, for use in Press Room (or news conferences)
21. Security (for JIC when unstaffed, and for news conferences)
22. Paper towels, facial tissues (Kleenex)

9753 Public Affairs Section Staffing

In accordance with the Oil Spill Field Operations Guide (FOG) ICS-OS-420-1, there will be one **Lead Information Officer (IO)**, assigned from either the USCG or OSPR. The IO heads the

entire public affairs effort, and is responsible for developing and releasing information about the incident to the news media, to incident personnel, and to other appropriate agencies and organizations. S/he has direct contact with the Unified Command (UC), attends UC meetings, and informs the UC of the news media's focus and areas of particular interest. S/he answers directly to the State and Federal On-Scene Commanders, and ensures that information flows in both directions between the UC, PA staff, and media/public. S/he supervises the Deputy Information Officer, Joint Information Center (JIC) Chief, and Community Relations Officer.

Only one Information Officer will be assigned for each incident, including incidents operating under Unified Command (UC) and multi-jurisdictional incidents. The IO may have as many assistants, responsible for specific public affairs tasks, as necessary. The assistants my also represent assisting agencies or jurisdictions. The assistants will fill the following positions within a JIC, under the direction of the lead IO. The IO should make these assignments in consultation with ICS, based on the expertise of each assistant. Qualified PA personnel may fill all assistant positions from the USCG, OSPR, RP, or other responding organizations and no single agency should dominate the lead positions.

1. **Deputy Information Officer** — Assists the IO directly, and serves as facilitator between the IO and the JIC Chief, Media Relations Supervisor, and others as needed. Is responsible for internal information flow from JIC to the response community (ICS responders & "home office" staff).

2. **JIC Chief** — This should be an experienced, well-organized PA specialist with working knowledge of oil spill response issues, ICS, basic supervision, and, if possible, the local media. The JIC Chief is responsible for managing the JIC, under the direct guidance of the lead IO. The JIC Chief will:
   a. Determine staffing needs for the JIC. Assess the experience, skills, capabilities, and interests of available PA staff, and match staff with appropriate positions within the JIC (telephones, information coordinators, media relations, writing/production, support, etc.);

   b. Review information supplied by information coordinators and determine appropriate method for dissemination (to writers/production for news releases, fact sheets & updates, copying and writing on status board for JIC staff, etc.);

   c. Elevate sensitive or unresolved issues to the Lead IO;
   d. Ensure news releases, fact sheets, and media advisories are distributed to JIC staff, Command staff, on- and off-site news media, and other interested parties;

   e. Provide orientation for newly arriving or assigned staff (this task may be delegated to the JIC Deputy Chief or other staff as appropriate).

3. **JIC Deputy Chief** — Reports to JIC Chief and carries out assignments as given. Should be from a different organization than Chief. Supervises media relations, production and support groups, and must be able to carry out all the responsibilities of the JIC Chief when necessary. May be called on to be JIC Chief during night shifts.

4. **Information Coordinators** — Report to the JIC Chief and gather information about the spill response effort directly from Operations, Planning, Logistics, and Finance sections. Information coordinators will work closely with the appropriate section supervisor and/or designated public information contact. Information gathered is provided to the JIC Chief

immediately, for dissemination to the media, public, and entire response community. Information coordinators are assigned to Operations (on- and off-shore, as needed), Planning/Environmental (wildlife, habitat, NRDA), Planning/Situation, Logistics, and Finance, and will use status sheets to help determine what information and activities should be recorded. Specific information to be collected by Information Coordinators includes the following:

a. **Off-Shore Operations** —
Information on the vessel(s) involved in the incident (i.e.: name, ownership, registry, destination)
Size and type (single hull, double hull, freighter, tanker, barge, yacht...)
Cargo and fuel type
Extent of damage to vessel(s), and (if known) cause of damage
Information on crew status (injuries, missing) and search & rescue operations
Size (area covered) and volume of spill
Information on the spilled material
Safety restrictions or advisories (Notice to Mariners, closed air space, etc.)
Number & activities of oil skimmers and other on-water response operations (amount of boom deployed & location, types of equipment, names of contractors, etc.).
Amount of spilled material recovered
Stabilization, salvage, and other activities directed at the vessel(s) involved in the incident.

b. **On-Shore Operations —**
Locations of equipment and staging areas
Number and activities of shoreline clean-up crews
Amount of oil and oiled debris recovered
Waste storage and disposal activities
Any special provisions for local residents (medical monitoring, decontamination stations, etc.)

c. **Environmental —**
Number, status and description of oiled wildlife (species, # captured, collected dead, estimated oiled)
Status and description of oil slick (trajectories, from NOAA)
Environmentally sensitive areas impacted or threatened by spill
Protective actions that will be taken in sensitive areas
Activities taking place at wildlife care centers and OSPR vet van
Volunteer activities (if any) and desirability of convergent volunteers (give 800 phone #)

d. **Planning-Logistics-Finance —**
Weather and tides
Incident Action Plan (overall response objectives)
Noteworthy logistical activities (equipment from out-of-state, etc.)
Claims processing information (telephone number for 3rd party claims against spiller)
Total number of people involved in response effort (and organizational breakdowns)

5. **Media Relations** — Positions in this group are filled by experienced PA staff that has media experience and local knowledge (particularly geographical features), if possible. The media relations group, headed by a **Media Relations Supervisor (MRS)**, answers news media questions, sets up facilities for news conferences, and reports to the JIC

Deputy Chief. The MRS ensures that all media relations staff have the most current information available on the spill response effort.

Media Phone Staff must include at least one representative each from the USCG, OSPR, and RP. Other affected local governments and organizations may also provide staff. Typically this might include PAs from the National Park Service or State Dept. Of Parks and Recreation (closed beaches or parks), impacted city or county, NOAA, etc. Phone staff will answer inquiries from the news media, direct calls to appropriate staff when an "agency" or "RP" response is warranted, and provide the MRS with questions and "rumors" that need to be checked-out. There must be enough phone staff on duty to answer all phone lines in the JIC.

On-Site Media Staff will monitor news coverage and:

a. Assist reporters at command post or spill site;
b. Work with MRS to locate appropriate staff for interviews;
c. Escort reporters and photographers through command post and/or spill site;
d. Set-up facility for news conferences and facilitate pool coverage when necessary;
e. Provide directions to field locations as appropriate;
f. In absence of clerical support staff, do clerical support tasks, as needed.

6. **JIC Production Staff** consists of writers and a graphic designer/artist, and reports to the JIC Deputy Chief. The Production staff prepares news releases, updates, fact sheets, media advisories, maps, and other graphics materials for the news media and public. The **Production Supervisor** ensures written and graphics materials are produced as needed for public dissemination, news conferences, and public meetings. **Writers** must have solid journalistic abilities, know AP Style, and be proficient with computers and word processing programs (i.e.: WordPerfect and/or MS Word). Writers prepare materials as directed by the Production Group Supervisor or JIC Chief. The **Graphic Designer** prepares maps, status boards, and other graphic materials for use in news conferences, public meetings, and for dissemination through the media.

7. **JIC Support Staff** are PAs or knowledgeable clerical support personnel with above-average communication skills, and report to the JIC Deputy Chief. The JIC Support staff will:

   a. Make copies of news releases, fact sheets, maps, advisories, etc.;

   b. Disseminate materials as directed to internal OSCs, Operations, Planning, Logistics, Finance sections, Liaison & Safety Officers) and external recipients (media and off-site agency/company representatives);

   c. Maintain status boards (update hourly) and map of spill response actions (update hourly);

   d. Answer phones & take messages, ensure the JIC has necessary office supplies, perform other support duties as required by the JIC Deputy Chief.

Note: Two staff groups that are sometimes associated with Public Affairs — Community Relations and Government Relations — are handled in California by the **Liaison Officers (LO)**, who are part of the Unified Command Staff. The lead IO and LO communicate frequently, sharing information regarding media and VIP tours of the spill site, most frequently-asked

questions, and information updates from areas within the response organization. Efforts should be made to keep VIP and media tours separate, so officials aren't tempted to use the occasion to "grandstand," and reporters aren't tempted to use the occasion to interrogate officials, or interview them regarding unrelated issues. We want to keep everyone on-track. Under no circumstances should VIP/protocol or community relations be a collateral duty of the media relations staff, during a major incident.

9754 Logistical Concerns for News Conferences

Pollution incidents that generate significant media interest require news conferences, at least in the first few days of emergency response. These media gatherings provide an opportunity for the three Incident Commanders (FOSC, SOSC, & RP) to tell the media what has happened and what they're doing about it. It also gives reporters a chance to photograph and ask questions of senior response officials.

If the incident is large enough for the JIC to have a Media Relations Supervisor (MRS), s/he is responsible for scheduling news conferences, managing the "press room" or conference site, advising the media in advance of upcoming news conferences, and ensuring that news releases, updated fact sheets, or press packets, podium & PA system (if needed), and visual aids (large charts, maps, diagrams) are in place before news conferences begin. In absence of a MRS, the lead Information Officer or a PAO s/he designates will be responsible for media relations activities.

News conferences should, ideally, be held in a dedicated "press room," preferably in the same building as the command post, but completely separated from the Unified Command's room or area where operations and planning staff are working. (The JIC should be between the pressroom and UC's meeting room.) Ideally, it would be near the entrance to the building and have entries from both sides of the room. Such a dedicated room allows the MRS to leave charts, maps, and diagrams posted for reporters and photographers to see, throughout the response phase. These must be updated, as often as new information becomes available, and would typically include enlarged aerial photos, spill trajectories, NOAA-generated displays, wildlife injury/mortality counts, and maps indicating the locations of oil, boom, skimming operations, closed beaches, and environmentally-sensitive areas (Threatened & Endangered Species' habitats).

If a room at the command post is not available, news conferences could also be conducted next to a mobile command post, such as the Pacific Strike Force trailer. The outer walls of the trailer can be posted with the maps, charts, etc. A major drawback to outdoor news conferences is a lack of acoustics. It is more difficult to hear a speaker outside, especially if there is much wind or any ambient sound (such as traffic, surf, clean-up equipment, etc.). Even a slight breeze will cause papers to blow away, and wind can make a distracting noise when it blows across a microphone. News conferences held at a spill site must be carefully controlled, to mitigate safety hazards and prevent any interference with clean-up operations.

Both print and TV photographers will want access to the spill site. California Penal Code Title 11, Section 409.5(d) exempts "duly authorized representatives of any news service, newspaper, or radio or television station or network from entering the areas closed" to the public by law enforcement, because of any calamity or disaster. Reporters may not interfere, but they may observe and photograph an incident site. The UC may require media to check-in and -out, and provide proof that they represent legitimate media outlets. A business card that matches some photo I.D., or letter of introduction on company letterhead will suffice, for those who lack official

CHP press credentials. They are responsible for their own safety. (Exceptions to the media exemption from PC 409.5 are crime scenes and air crashes, where an investigation is necessary.)

Direct access to private property such as facilities, vessels, or barges will remain under the control of the owner. If possible, a Coast Guard vessel should be made available for media tours of the affected area from the waterside. When media interest exceeds the capacity of the vessel, it will be necessary to form a press pool. The selection of participants is best left to members of the media, but generally includes equal representation from print, TV, Radio, and "wire" service (AP, UPI, et al.). News organizations may also obtain their own vessel, plane, or helicopter for surveillance. Unless granted specific access by appropriate authority (FOSC), they will continue to be governed by any security or safety zones around the site.

The lead Information Officer is responsible for briefing the three Incident Commanders (ICS) in advance, advising them of the subjects in which media seem most interested that day, and facilitating the news conference. (S/he may delegate the latter task.) One successful format has been this:

1. Lead IO welcomes media, introduces self and ICs (who should be seated at a front table, if possible), then describes the format.

2. S/he explains that each IC will make a statement regarding his/her organization's area of responsibility, then answer questions from reporters.

3. After all three ICs have made their statements, the IO will request that reporters who have questions raise their hands, and when s/he recognizes them, identify themselves and their organization, before asking their questions. S/he will have assigned a member of the Media staff to record the names and organizations of each reporter, for the record.

4. If a time limit has been established prior to the news conference, the IO should say so, while describing the format. When the allotted time has nearly passed, the IO should tell the reporters (i.e.: "We only have a few minutes before the Incident Commanders need to get back to the spill response..."). At the end of the available time, the IO wraps it up, thanks the reporters for coming, and points out Media Staff who can answer additional questions. A uniformed USCG or OSPR law enforcement officer will escort the ICs from the pressroom or site.

The lead IO or his/her designee should request security at news conferences, escalating the degree if there is any indication of possible demonstrations or "gate-crashing" by people outside the legitimate media.

9755 Internal Information

Purpose

Informing the members of the response community of the status of the response is vital, if consistent and accurate information is to be conveyed to all interested parties. Likewise, the UCs needs to know what subjects are of greatest interest to the media and community. Internal information is the process of informing our own people of the status of our activities, and of public interest in the incident.

Discussion

At a minimum, all personnel assigned to response duties should be provided with access to the daily fact sheet(s) prepared by the media relations supervisor. Conversely, all PAs need frequent updates on the response activities, wildlife casualty counts, etc. This will help ensure a consistent and accurate flow of information. The Deputy Information Officer shall be responsible for internal information dissemination.

Action

1. Distributing copies of the fact sheets and news releases to the cooperating agencies and their employees is a function of the internal information staff. During clean-up operations of a lengthy duration, consideration may be given to a computer-generated or hard copy publication, published at regular intervals.

2. To facilitate the flow of information and ensure that the information given to the media by JIC staff is the most current available, the Support unit of the Logistics section will provide the JIC with at least one "runner." The runner(s) will gather updated information from other units (Situation, Wildlife, Ops, Planning) for use by the JIC writers, and take updated fact sheets and news releases to each section or branch in and near the Command Post.

9756 Photo Documentation

Purpose

Photo documentation, both still and video, has a three-fold purpose: (1) Additional resource material for news media outlets, (2) briefing materials for town meetings and protocol-sanctioned visits, and (3) historical documentation. It is not the intention of establishing this unit to provide documentation for a legal action against the responsible party or spiller. Separate arrangements must be made by legal entities to provide this function for litigation.

Discussion

As a unit reporting directly to the Deputy Information Officer, the needs of the Unified Command are prioritized and assigned by this individual. When the news media cannot visit locations due to safety concerns, it is the responsibility of the photo documentation unit to provide this information.

Action

Resources available to fill this requirement begin with the three lead agencies of USCG, OSPR, and the RP. Access and assistance from the DOD's Combat Camera should be solicited by the FOSC by message traffic, early in the clean-up effort.

1. One person should be designated Chief Photographer for each incident. Depending on the size and complexity of the incident, s/he may request assistance. If additional photographers (still and/or video) are employed, consideration should be given to balancing the organizations represented (i.e.: USCG, OSPR, and RP). The resulting photographic record should represent as

many areas of response as possible, and all response organizations (not just the photographer's own organization).

9757 Administration

Purpose
Provide administrative support to the various branches of the public affairs effort. This includes the JIC, Community Relations, and Photo Documentation units. The Support branch of the Logistics section provides record-keeping, purchasing, and logistical support.

Action
Support staff report directly to the Deputy IO and are assigned tasking, according to the needs of the Public Affairs branches.

Staffing
Immediate staffing (first 48 hours) should consist of at least one (1) Yeoman and one (1) Storekeeper with District, Reserve, and Auxiliary (See Section **5612** for CG Personnel Resources) augmentation following for the longer duration. Support staff may also be provided by the DFG/OSPR, the RP, and volunteers.

9758 Community Relations

Background

Providing information directly to members of the impacted community, free of the filtering and potentially distorting effect of the media, is critical to public understanding of the incident response. Community relations may include scheduling of public meetings, preparing speeches and coordinating public activities with the Liaison Officer and local government MAC representative. If a spill's impact justifies a Community Relations branch, it should be within the Public Affairs section.

Discussion

In order to ensure that important constituencies are not overlooked or slighted during a major response, it is important that a **Community Relations Officer (CRO)** and necessary support staff be assigned within the public affairs branch. Under no circumstances should community relations be a collateral duty of the media relations staff, during a major incident. A local government official should be considered for the position. Additional community relations officers should be sought from the RRT and regional EPA office, to provide expertise to this important aspect of the public affairs program.

Action

Important considerations for establishing a separate Community Relations branch include public health & safety, damage claims, and transportation disruptions. The media may not provide detailed information to their audiences on issues that affect smaller groups of individuals. It is incumbent on community relations staff to provide answers to the impacted communities.

A well-run community relations program is a two-way street in a successful public affairs program. Authoritative answers to important individual questions are given and the UC gains a

"grass-roots" feel for the concerns of the individuals directly impacted by the spill. Those concerns can then be addressed by the Command Staff to mitigate problems before the problems begin to drive the clean-up effort.

1. Public Health and Safety

The primary, initial concern of the community relations staff should be addressing the public health & safety issues. When warranted, an EDIS alert should be issued, outlining the specific health & safety concerns.

2. Phone Banks

Consideration should be given to establishing an "800" telephone bank for general public inquires, which should be answered by community relations staff (**not** the media relations staff). A team of operators separate from media phone staff would disseminate information about public health & safety, transportation disruptions, third-party claims, etc. Ideal staffing would include representatives from Federal, State, and local governments, and community affairs personnel from the responsible party. This conduit would serve as rumor control and provide the UCs with the current concerns of local citizens. Spokespersons should use the "Rumor Inquiry" form to track these.

The OSPR has two existing "800" numbers for use during spills. One is a pre-recorded outgoing message containing spill information (**800-999-1043**), controlled by the OSPR Public Affairs Officer. It is updated (as needed) by the OSPR PAO; it does not record incoming messages. The other is answered by the OSPR Volunteer Coordinator (VC), in the Planning Section's Resources unit (**800-228-4544**). It has voice mail, for times the VC is not available to answer it.

3. Town Meetings

Local community meetings should be considered by the UC when communities suffer severe environmental, recreational, economic, or cultural impact. In extremely large communities, arrangements should be made for teleconference sites in addition to the "live" site. The CRO should arrange town meetings with the Liaison Officers, in consultation with the UC.

4. Claims

Questions about damage to private property, loss of income, and disruption of transportation become real concerns in a major oil spill. Information directing individual recourse must be addressed early in the clean-up process. The Responsible Party will take the lead on addressing these issues and provide the Community Relations branch with information that alleviates and mitigates these real concerns. It is imperative that the JIC staff (all PAs) knows the "claims phone" number, to give media and other callers who request information.

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